

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION II

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:
IN THE MATTER OF THE FRONTIER :
CHEMICAL SITE, NIAGARA FALLS, :
NEW YORK :
:
Cycle Chem, Inc. :
Codo Manufacturing Co. :
Eagle Vision Environmental, Inc. :
Frontier Chemical Waste Process, Inc.:
Industrial Fuels and Resources, Inc. : ADMINISTRATIVE ORDER
Lowengart & Co., Inc. : FOR REMOVAL ACTION
Monet, Inc. :
National Chemical Co., Inc. : Index Number
RTI : II-CERCLA-94-0224
Town of Camillus :
Tronex Chemical Corp., :
:
Respondents. :
:
Proceeding Under Section :
106(a) of the Comprehensive :
Environmental Response, :
Compensation, and Liability :
Act, as amended, 42 U.S.C. :
§9606(a) :
X

I. JURISDICTION AND GENERAL PROVISIONS

1. This Administrative Order ("Order") is issued by the United States Environmental Protection Agency ("EPA") to the above-captioned Respondents ("Respondents"). This Order provides for the performance of a removal action by Respondents at the Frontier Chemical Site ("Site"), which is located at 4626 Royal Avenue in Niagara Falls, Niagara County, New York.
2. This Order is issued pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9606(a), and delegated to the Administrator of EPA on January 23, 1987, by Executive Order No. 12580 (52 Federal Register 2926, January 29, 1987) and further delegated to the EPA Regional Administrators by EPA Delegation Nos. 14-14-A and 14-14-B.
3. EPA has notified the New York State Department of Environmental Conservation ("NYSDEC") of this Order pursuant to Section 106(a) of CERCLA, 42 U.S.C. §9606(a).

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4. (A) On July 5, 1994, EPA issued an Administrative Order on Consent, Index No. II-CERCLA-94-0205 (the "Consent Order"), to certain other parties ("Performing Parties") listed in Appendix II hereto, which requires the Performing Parties to conduct the same response actions as those required by this Order. Respondents shall make best efforts to coordinate with the Performing Parties. Best efforts to coordinate shall include, at a minimum:

(a) Communication in writing within ten (10) days of the effective date of this Order to any Performing Parties (or to David Cook, Esq. at Nixon, Hargrave, Devans & Doyle, Clinton Square, P.O. Box 1051, Rochester, NY 14603, on behalf of the Performing Parties) as to Respondents' desire to comply with this Order and to participate in the performance of the Work or in lieu of performance to pay for the performance of the Work;

(b) submission within twenty (20) days of the effective date of this Order of a good-faith offer to any Performing Parties (or to David Cook on behalf of the Performing Parties) to perform the Work, in whole or in part, or in lieu of performance to pay for the Work, in whole or in part; and

(c) engaging in good-faith negotiations with any Performing Parties to perform or in lieu of performance to pay for the Work required by this Order if such Performing Parties refuse Respondents' first offer.

(B) Respondents shall make best efforts to participate in the performance of the Work with the Performing Parties. Best efforts to participate shall include, at a minimum:

(a) performance of the Work as agreed by Respondents and the Performing Parties to be undertaken by Respondents, pursuant to the Work Plans referred to in Section VI below; and

(b) payment of all amounts as agreed by Respondents and the Performing Parties to be paid by Respondents if, in lieu of performance, Respondents have offered to pay for the Work required by this Order, in whole or in part.

(C) Respondents shall provide EPA with notice of their intent to comply with this Order, consistent with paragraph 80 below. In addition, Respondents shall notify EPA in writing within five (5) days of the rejection, if any, by any Performing Parties of Respondents' offer to perform or, in lieu of performance, to pay for the Work.

(D) The undertaking or completion of any requirement of this Order by any other person, with or without the participation of Respondents, shall not relieve Respondents of their obligation to perform each and every other requirement of this Order.

(E) Any failure to perform, in whole or in part, any requirement of this Order by any other person with whom Respondents are coordinating or participating in the performance of such requirement shall not relieve Respondents of their obligation to perform each and every requirement of this Order.

II. PARTIES BOUND

5. This Order applies to and is binding upon Respondents and their successors and assigns. Any change in the ownership or corporate status of a Respondent, including, but not limited to, any transfer of assets or real or personal property, shall not alter the responsibilities of any of the Respondents under this Order. Respondents are jointly and severally responsible for carrying out all activities required by this Order. Compliance or noncompliance by one or more Respondent(s) with any provision of this Order shall not excuse or justify noncompliance by any other Respondents.

6. Respondents shall provide a copy of this Order to any prospective owners or successors before a controlling interest in Respondents' assets, property rights, or stock are transferred to the prospective owner or successor.

7. Not later than sixty (60) days prior to the transfer by a Respondent of any real property interest in any property included within the Site, said Respondent shall submit a true and correct copy of the transfer document(s) to EPA, and shall identify the transferee by name, principal business address and effective date of the transfer.

III. DEFINITIONS

8. Unless otherwise expressly provided herein, terms used in this Order which are defined in CERCLA or in regulations promulgated under CERCLA shall have the meaning assigned to them in CERCLA or its implementing regulations. Whenever terms listed below are used in this Order or in an attachment to this Order, the following definitions shall apply:

a. "Day" means a calendar day unless otherwise expressly stated. "Working day" shall mean a day other than a Saturday, Sunday, or federal holiday. In computing any period of time under this Order, where the last day would fall on a Saturday, Sunday, or federal holiday, the period shall run until the close

of business on the next working day.

b. "Hazardous substance" shall have the meaning provided in Section 101(14) of CERCLA, 42 U.S.C. §9601(14).

c. "Party" or "Parties" means the United States Environmental Protection Agency and/or Respondents.

d. "Tanks" means all bulk storage vessels at the Site identified in Appendix I to this Order, including, but not limited to, steel tanks, fiberglass tanks, bulk storage boxes, tank trailers, reactor vessels, and wastewater treatment carbon and sand filters.

e. "Waste" means (1) any "hazardous substance" under Section 101(14) of CERCLA, 42 U.S.C. § 9601(14); (2) any "pollutant or contaminant" under Section 101(33) of CERCLA, 42 U.S.C. § 9601(33); (3) any "solid waste" under Section 1004(27) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6903(27); and (4) any mixture containing any of the constituents noted in (1), (2) or (3), above.

f. "Work" means all work and other activities required by and pursuant to this Order. This Order is not intended to address a remedial investigation/feasibility study at the Site. That work and any other additional work may be the subject of a future administrative order or other enforcement activity by EPA.

IV. FINDINGS OF FACT AND CONCLUSIONS OF LAW

9. The Site is located at 4626 Royal Avenue in Niagara Falls, Niagara County, New York. The Site includes a former hazardous waste processing facility located within a heavily industrialized section of Niagara Falls. It includes a portion of the property represented on the Lockport, New York Tax Map as Lots 47 and 48, Parcels A and B (the "Site Property"). The Site includes approximately 9.7 acres.

10. The Site Property is owned by Francis Williams, James H. Williams and Lawrence Reger, formerly doing business under the name of Niagara Industrial Warehousing and currently doing business under the name of Marc Equity Realty Associates. Marc Equity Realty Associates and the aforementioned three individuals are "responsible parties" within the meaning of Section 107(a)(1) of CERCLA, 42 U.S.C. § 9607(a)(1).

11. Frontier Chemical Waste Process, Inc. ("Frontier"), a corporation organized and existing under the laws of the State of New York, leased the Site Property and, from 1974 until 1992, operated a business there which was primarily engaged in hazardous waste processing/management, including wastewater

treatment, fuels blending and bulking for off-site disposal.

12. Frontier was an operator of the Site at the time of disposal of hazardous substances at the Site. Accordingly, Frontier is a responsible party under Section 107(a)(2) of CERCLA, 42 U.S.C. §9607(a)(2).

13. During the course of its operations Frontier was the subject of numerous consent orders issued by NYSDEC for regulatory violations.

14. On or about August 13, 1991, Eagle Vision Environmental Inc. ("Eagle Vision"), a Colorado-chartered, Florida-based corporation, assumed responsibility for the day-to-day management of operations at the Site. Eagle Vision was an operator of the Site at the time of disposal of hazardous substances at the Site. Accordingly, Eagle Vision is a responsible party under Section 107(a)(2) of CERCLA, 42 U.S.C. § 9607(a)(2).

15. On December 4, 1992, the NYSDEC Commissioner, Thomas C. Jorling, signed a "Modification to Summary Abatement Order and Notice of Hearing" (hereinafter, "NYSDEC Order") pertaining to the Site. The NYSDEC Order required Frontier and Eagle Vision to submit a schedule for the removal of all waste from the Site, to submit Demolition and Closure Plans for particular buildings at the Site and to establish escrow accounts for security against non-payment of utility bills and employee salaries within a fixed amount of time or close the facility. The NYSDEC Order also enabled NYSDEC to initiate an emergency removal action conducted by either NYSDEC or EPA in the event that the parties failed to meet the terms of the NYSDEC Order. Frontier waived its right to a hearing and Eagle Vision subsequently notified NYSDEC that it was not able to comply with the terms of the NYSDEC Order. NYSDEC issued a Right to Invoke Action ("RIA") based upon Frontier and Eagle Vision's noncompliance with the terms of the NYSDEC Order. The RIA stated that NYSDEC and EPA were invoking their right to enter the facility and initiate appropriate emergency removal actions. Frontier personnel at the Site were told by EPA to vacate the premises.

16. Pursuant to administrative orders issued by EPA on September 30, 1993, potentially responsible parties ("PRPs") have performed field activities for a removal action focused on drums and laboratory chemicals at the Site.

17. This Order is concerned with the tanks at the Site. There are forty-five tanks located at the Site, which contain a variety of hazardous substances. The hazardous substances in the tanks include cyanides, D002 acids (pH<2), D002 bases (pH>12.5), F001 and F002 halogenated solvents, F003 and F005 non-halogenated solvents, and F-and-D-listed flammable liquids.

18. Actual releases of hazardous substances have occurred at the Site and there is a continuing threat of releases at the Site, as the term "release is defined in Section 101(22) of CERCLA, 42 U.S.C. §9601(22). For example, on June 24, 1993, a leak occurred in a tank containing a cyanide solution, a poisonous liquid. On July 2, 1993, a leak occurred in a tank containing sodium hydroxide, a corrosive liquid. On August 24, 1993, a leak occurred in a tank containing an acid solution, a corrosive liquid. On January 25, 1994, a pipeline containing muriatic acid ruptured, releasing a corrosive liquid into a containment area on-site.

19. Until August, 1994, EPA performed maintenance at the Site. The Performing Parties' contractor has assumed maintenance activities at the Site and is performing maintenance activities including the following tasks: repairing leaking tanks; maintaining boilers that supply steam to the steam tracer lines, process lines and heat to the drum storage buildings; maintaining compressors which are essential to the fire control system on-site; pumping storm waters from containment areas through the on-site carbon absorption system and into storage tanks, pending approval for discharge; and performing regularly scheduled inspections to examine the structural integrity of drums and tanks.

20. EPA has information which indicates that each of the Respondents listed in the above caption, other than Frontier and Eagle Vision, arranged for the treatment or disposal of hazardous substances that were disposed of or came to be located at the Site and are therefore responsible parties pursuant to Section 107(a)(3) of CERCLA, 42 U.S.C §9607(a)(3).

21. Exposure to the various hazardous substances present at the Site by direct contact, inhalation, or ingestion may cause a variety of adverse human health effects.

22. The Site constitutes a "facility" within the meaning of Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

23. Respondents are "persons" within the meaning of Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

V. DETERMINATIONS

24. The conditions present at the Site constitute a threat to public health, welfare, or the environment based upon factors set forth in Section 300.415(b)(2) of the NCP. These factors include, but are not limited to, actual or potential exposure to nearby human populations and hazardous substances in drums and other containers that may pose a threat of release.

25. The actual or threatened release of hazardous substances from the Site may present an imminent and substantial endangerment to the public health, welfare, or the environment within the meaning of Section 106(a) of CERCLA, 42 U.S.C. § 9606(a).

26. The actions required by this Order are necessary to protect the public health or welfare or the environment, are in the public interest, and are consistent with CERCLA and the National Contingency Plan ("NCP"), 40 CFR Part 300.

VI. ORDER

27. Based upon the foregoing Findings of Fact, Conclusions of Law, Determinations, and other information available to EPA, it is hereby ordered that Respondents shall undertake a response action at the Site in accordance with the requirements specified below. All activities specified below shall be initiated and completed as soon as possible even though maximum time periods for their completion are specified herein.

Designation of Contractor and Project Coordinator

28. The Performing Parties have selected as their Project Coordinator Richard A. Marx of Nixon, Hargrave, Devans & Doyle, Clinton Square, P.O. Box 1051, Rochester, NY 14603, and EPA has approved that selection. The Project Coordinator is responsible for oversight of the work that is required by the Consent Order and this Order. Respondents shall coordinate and cooperate with the Performing Parties and the selected Project Coordinator, and all EPA correspondence to the Performing Parties and the Respondents relating to the work required by the Consent Order and this Order will be sent to that Project Coordinator. To the greatest extent possible, the Project Coordinator shall be present on Site or readily available during Site work. Respondents may change their designated Project Coordinator, subject to approval by EPA. Respondents shall notify EPA at least seven (7) days before such a change is made. The initial notification may be orally made but it shall be promptly followed by a written notice. EPA retains the right to disapprove of any Project Coordinator based upon the Project Coordinator's technical background and experience. If EPA disapproves of a proposed Project Coordinator, Respondents shall propose a different Project Coordinator and shall notify EPA of that person's name, address, telephone number, and qualifications within seven (7) days following EPA's disapproval.

29. The Performing Parties have selected and EPA has approved a contractor to perform the work required by the Consent Order. The contractor is Cranbury Remediation, Inc. ("Cranbury"). Cranbury has retained Blasland, Bouck & Lee, Inc. ("BB&L") as its

consultant. Respondents shall coordinate and cooperate with the Performing Parties, Cranbury and BB&L in the performance of the Work. Respondents shall also notify EPA of the name and qualifications of any other contractor or subcontractor proposed to perform work under this Order at least ten (10) days prior to commencement of such work.

30. EPA retains the right to disapprove of any, or all, of the contractors and/or subcontractors proposed by the Respondents to conduct the Work based upon the contractor's or subcontractor's technical background and experience. If EPA disapproves of any of Respondents' proposed contractors to conduct the Work, Respondents shall propose a different contractor within seven (7) days of EPA's disapproval.

31. Respondents shall provide a copy of this Order to each contractor and subcontractor approved and retained to perform the work required by this Order. Respondents shall include in all contracts or subcontracts entered into for work required under this Order provisions stating that such contractors or subcontractors, including their agents and employees, shall perform activities required by such contracts or subcontracts in compliance with this Order and all applicable laws and regulations. Respondents shall be responsible for ensuring that its contractors and subcontractors perform the work contemplated herein in accordance with this Order.

32. Respondents shall direct all submissions required by this Order to the EPA On-Scene Coordinator by certified mail at the address provided in paragraph 50.

Description of Work

33. Respondents shall participate in the implementation of the Sampling and Analysis/Site Security and Maintenance ("SA/SSM") Plan and the Removal Action Plan (hereinafter collectively referred to as the "Work Plans") submitted by the Performing Parties to EPA. The Performing Parties submitted the SA/SSM Plan to EPA on July 27, 1994. EPA approved the SA/SSM Plan on August 4, 1994. The SA/SSM Plan encompasses sampling and analysis of the tank waste, site security, and overall site maintenance. Based on initial sampling results of the tanks, the Performing Parties' contractor submitted the Removal Action Plan to EPA on September 22, 1994. The Removal Action Plan encompasses removal of the tank wastes and decontamination of the tank containment areas and tank containment areas and piping. Respondents may obtain a copy of the Work Plans from the Project Coordinator named in paragraph 28 above. The Work Plans address the following:

- a. A detailed time schedule for performance of specific tasks and for submitting plans and reports to EPA and

a detailed description of how these tasks will be accomplished.

- b. Detailed procedures and methods to be implemented to sample all tanks at the Site, and post-sampling of the tanks, piping and containment areas.
- c. Procedures for bulking, stabilization, and/or solidification of tank contents; and the steps to determine if bulking and solidification are recommended.
- d. Procedures for recycling product contained within some tanks.
- e. Plans for the assumption of all responsibilities relating to site security and the operation and maintenance of the facility.
- f. Plans for disposal of all tank contents at the Site. Waste profile forms shall be completed for all tank waste or product leaving the Site. The tank waste or product must be weighed upon departure from the Site and upon arrival at the EPA-permitted treatment/disposal facility.
- g. Procedures for decontamination of the tanks, associated piping and tank containment areas at the Site.
- h. Decontamination procedures for expendable and nonexpendable contractor equipment.
- i. A Quality Assurance/Quality Control ("QA/QC") Plan for sampling and analyzing the tank contents.
- j. A Health and Safety Plan, which shall satisfy the requirements of 29 CFR Part 1910.120, Hazardous Waste Operations Standards, and EPA's "Standard Operating Safety Guides" (OSWER, 1988). This Health and Safety Plan must include detailed confined space entry procedures consistent with 29 CFR Part 1910.146, and a detailed contingency and emergency response plan in the event of a spill or fire during the tank remediation work.

34. EPA has approved the SA/SSM Plan and is reviewing the Removal Action Plan. If EPA requires modifications to the Work Plans, the Respondents shall modify the Work Plans pursuant to paragraphs 43-46, below. Upon their approval by EPA, the Work Plans shall be deemed to be incorporated into and enforceable parts of this Order.

35. Within ten (10) days after EPA's approval of the Removal Action Plan, Respondents shall commence implementation of the EPA-approved Removal Action Plan. Respondents shall cooperate with the Performing Parties to fully implement the EPA-approved Work Plans in accordance with the terms and schedule therein and in accordance with this Order.

36. Respondents shall notify EPA of the names and addresses of all off-Site waste treatment, storage, or disposal facilities selected by Respondents to receive wastes from the Site. Respondents shall provide such notification to EPA at least five (5) days prior to off-Site shipment of such wastes.

37. At the time of completion of all activities required by this Order, demobilization shall include sampling if deemed necessary by EPA, and proper disposal or decontamination of protective clothing, remaining laboratory samples taken pursuant to this Order, and any equipment or structures constructed to facilitate the cleanup.

38. All work pursuant to this Order shall be completed by Respondents as soon as possible, but in no event later than six (6) months after the date of EPA's approval of the Work Plans, unless EPA specifically extends that 6-month deadline in writing.

On-scene Coordinator, Other Personnel, and Modifications
to EPA-Approved Work Plans

39. All activities required of Respondents under the terms of this Order shall be performed only by qualified persons possessing all necessary permits, licenses, and other authorizations required by federal, state, and local governments, and all work conducted pursuant to this Order shall be performed in accordance with prevailing professional standards.

40. The current EPA On-Scene Coordinator ("OSC") for the Site is: Kevin Matheis, Removal Action Branch, Emergency and Remedial Response Division, U.S. Environmental Protection Agency, 2890 Woodbridge Avenue, Building 209 (MS-211), Edison, N.J. 08837, (908) 321-6789. EPA will notify the Project Coordinator if EPA's OSC should change.

41. EPA, including the OSC, will conduct oversight of the implementation of this Order. The OSC shall have the authority vested in an OSC by the NCP, including the authority to halt, conduct, or direct any work required by this Order, or to direct any other response action undertaken by EPA or Respondents at the Site consistent with paragraph 33 of this Order. Absence of the OSC from the Site shall not be cause for stoppage of work unless specifically directed by the OSC.

42. As appropriate during the course of implementation of the actions required of Respondents pursuant to this Order, Respondents or their consultants or contractors, acting through the Project Coordinator, may confer with EPA concerning the required actions. Based upon new circumstances or new information not in the possession of EPA on the date of this Order, the Project Coordinator may request, in writing, EPA approval of modification(s) to the EPA-approved Work Plans. Only modifications approved by EPA in writing shall be deemed effective. Upon approval by EPA, such modifications shall be deemed incorporated in this Order and shall be implemented by Respondents.

Plans and Reports Requiring EPA Approval

43. If EPA disapproves or otherwise requires any modifications to any plan, report or other item required to be submitted to EPA for approval pursuant to this Order, Respondents shall have fourteen (14) days from the receipt of notice of such disapproval or the required modifications to correct any deficiencies and resubmit the plan, report, or other written document to EPA for approval, unless a shorter or longer period is specified in the notice. Any notice of disapproval will include an explanation of why the plan, report, or other item is being disapproved. Respondents shall address each of the comments and resubmit the plan, report, or other item with the required changes within the time stated above. At such time as EPA determines that the plan, report, or other item is acceptable, EPA will transmit to Respondents a written statement to that effect.

44. If any plan, report, or other item required to be submitted to EPA for approval pursuant to this Order is disapproved by EPA, even after being resubmitted following Respondents' receipt of EPA's comments on the initial submittal, Respondents shall be deemed to be out of compliance with this Order. If any resubmitted plan, report, or other item, or portion thereof, is not responsive to EPA's comments and is disapproved by EPA, EPA may again direct Respondents to make the necessary modifications thereto, and/or EPA may amend or develop the item(s) and recover the costs from Respondents of doing so. Respondents shall implement any such item(s) as amended or developed by EPA.

45. EPA shall be the final arbiter in any dispute regarding the sufficiency or acceptability of all documents submitted and all activities performed pursuant to this Order. EPA may modify those documents and/or perform or require the performance of additional work unilaterally.

46. All plans, reports and other submittals required to be submitted to EPA pursuant to this Order, upon approval by EPA, shall be deemed to be incorporated in and an enforceable

part of this Order.

Reporting

47. During the implementation of this Order, Respondents shall provide written progress reports to EPA every two weeks which fully describe all actions and activities undertaken pursuant to this Order. Such progress reports shall, among other things, (a) describe the actions taken toward achieving compliance with this Order during the previous two-week period, (b) include all results of sampling and tests and all other data received by Respondents during that period in the implementation of the Work required hereunder, (c) describe all actions which are scheduled for the next two-week period, (d) provide other information relating to the progress of work as is customary in the industry, (e) and include information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the Work required hereunder, and a description of all efforts made to mitigate those delays or anticipated delays.

48. Respondents shall include in the biweekly progress reports required in paragraph 47, above, a schedule for the field activities which are expected to occur pursuant to this Order during the upcoming month. Respondents shall, in addition, provide EPA with at least three working days advance notice of any change in that schedule.

49. The Final Report referred to in paragraph 51, below, and other documents submitted by Respondents to EPA which purport to document Respondents' compliance with the terms of this Order shall be signed by a responsible official of one or more of the Respondents or by the Project Coordinator named in paragraph 28 of this Order. For purposes of this paragraph, a responsible official is an official who is in charge of a principal business function.

50. The Final Report and other documents required to be submitted to EPA under this Order shall be sent to the following addressees:

3 copies to:

Kevin Matheis
U.S. Environmental Protection Agency
2890 Woodbridge Avenue
Bldg. 209 (MS-211)
Edison, NJ 08837
Attention: Frontier Chemical Site On-Scene
Coordinator

1 copy to:

Chief, New York/Caribbean Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency
26 Federal Plaza, Room 437
New York, New York 10278

Attention: Frontier Chemical Site Attorney

2 copies to:

Michael O'Toole, P.E.
Director, Hazardous Waste Remediation
New York State Department of Environmental
Conservation
50 Wolf Road, Room 212
Albany, New York 12233-7010
Attention: Frontier Chemical Site

51. Within thirty (30) days after completion of all removal activities required under this Order, Respondents shall submit for EPA review and approval a Final Report summarizing the actions taken to comply with this Order. The Final Report shall conform, at a minimum, with the requirements set forth in Section 300.165 of the NCP, entitled "OSC Reports." The Final Report shall include:

- a. a synopsis of all Work performed under this Order;
- b. a detailed description of all EPA-approved modifications to the Work Plans which occurred during Respondents' performance of the Work required under this Order;
- c. a listing of quantities and types of materials removed from the Site or handled on-Site;
- d. a discussion of removal and disposal options considered for those materials;
- e. a listing of the ultimate destination of those materials;
- f. a presentation of the analytical results of all sampling and analyses performed, including QA/QC data and chain of custody records;
- g. accompanying appendices containing all relevant documentation generated during the work (e.g., manifests, invoices, bills, contracts, and permits).

h. an accounting of expenses incurred by the Respondents at the Site.

i. The following certification signed by a person who supervised or directed the preparation of the Final Report:

"I certify that the information contained in and accompanying this certification is true, accurate, and complete."

52. EPA either will approve the Final Report or will require modifications thereto pursuant to paragraphs 43-46, above.

Oversight

53. During the implementation of the requirements of this Order, Respondents and their contractor(s) and subcontractors shall be available for such conferences with EPA and inspections by EPA or its authorized representatives as EPA may determine are necessary to adequately oversee the work being carried out or to be carried out by Respondents, including inspections at the Site and at laboratories where analytical work is being done hereunder.

54. Respondents and their employees, agents, contractor(s) and consultant(s) shall cooperate with EPA in its efforts to oversee Respondents' implementation of this Order.

Community Relations

55. Respondents shall cooperate with EPA in providing information relating to the work required hereunder to the public. As requested by EPA, the Respondents shall participate in the preparation of all appropriate information disseminated to the public; participate in public meetings which may be held or sponsored by EPA to explain activities at or concerning the Site; and provide a suitable location for public meetings, as needed.

Access to Property and Information

56. EPA, NYSDEC and their designated representatives, including, but not limited to, employees, agents, contractor(s) and consultant(s) thereof, shall be permitted to observe the Work carried out pursuant to this Order. Respondents shall at all times permit EPA, NYSDEC, and their designated representatives full access to and freedom of movement at the Site and any other premises where Work under this Order is to be performed for purposes of inspecting or observing Respondents' progress in implementing the requirements of this Order, verifying the information submitted to EPA by Respondents, conducting investigations relating to contamination at the Site, or for any

other purpose EPA determines to be reasonably related to EPA oversight of the implementation of this Order.

57. In the event that action under this Order is to be performed in areas owned by or in possession of someone other than Respondents, Respondents shall use their best efforts to obtain access agreements from the present owners within twenty (20) days of the effective date of this Order for purposes of implementing the requirements of this Order. Such agreements shall provide access not only for Respondents, but also for EPA and its designated representatives or agents, as well as NYSDEC and its designated representatives or agents. Such agreements shall specify that Respondents are not EPA's representatives with respect to liability associated with Site activities. If such access agreements are not obtained by Respondents within the time period specified herein, Respondents shall immediately notify EPA of their failure to obtain access and shall include in that notification a summary of the steps Respondents have taken to attempt to obtain access. Subject to the United States' non-reviewable discretion, EPA may use its legal authorities to obtain access for Respondents, may perform those response actions with EPA contractors at the property in question, or may terminate the Order if Respondents cannot obtain access agreements. If EPA performs those tasks or activities with EPA contractors and does not terminate the Order, Respondents shall perform all other activities not requiring access to that property. Respondents shall integrate the results of any such tasks undertaken by EPA into its reports and deliverables.

58. Upon request, Respondents shall provide EPA with access to all records and documentation related to the conditions at the Site, hazardous substances found at or released from the Site, and the actions conducted pursuant to this Order except for those items subject to the attorney-client or work product privilege. Privileges shall not be deemed waived by the sharing of information among the Respondents, their agents, or contractors. Nothing herein shall preclude the Respondents from asserting a business confidentiality claim pursuant to 40 C.F.R. Part 2, Subpart B. All data, information and records created, maintained, or received by Respondents or their contractor(s) or consultant(s) in connection with implementation of the Work under this Order, including, but not limited to, contractual documents, invoices, receipts, work orders and disposal records shall, without delay, be made available to EPA upon request, subject to the same privileges specified above in this paragraph. EPA shall be permitted to copy all such documents. Respondents shall submit to EPA upon receipt the results of all sampling or tests and all other technical data generated by Respondents or their contractor(s), or on the Respondents' behalf, in connection with the implementation of this Order.

59. On request of EPA and subject to any claims of applicable

privilege(s), Respondents shall submit to EPA all documents in their possession, custody, or control relating to (1) Respondents' offers to any Performing Parties to perform or pay for, or (2) Respondents' performance of or payment for, the Work required by this Order in conjunction with any Performing Parties.

60. Upon prior request by EPA, Respondents shall provide EPA or its designated representatives with duplicate and/or split samples of any material sampled in connection with the implementation of this Order.

61. Notwithstanding any other provision of this Order, EPA hereby retains all of its information gathering, access, and inspection authority under CERCLA, RCRA, and any other applicable statute or regulations.

Record Retention, Documentation, Availability of Information

62. Respondents shall preserve all documents and information relating to Work performed under this Order, or relating to the hazardous substances found on or released from the Site, for six years after completion of the Work required by this Order without either the express written approval of EPA to destroy such information or a written offer by Respondents to provide such information to EPA followed by EPA's written rejection of that offer. At the end of the six year period, Respondents shall notify EPA thirty (30) days before any such document or information is destroyed. Upon request, Respondents shall provide EPA with the originals or copies of such documents and information.

63. All documents submitted by Respondents to EPA in the course of implementing this Order shall be available to the public unless identified as confidential by Respondents pursuant to 40 CFR Part 2, Subpart B, and determined by EPA to merit treatment as confidential business information in accordance with applicable law. In addition, EPA may release all such documents to NYSDEC, and NYSDEC may make those documents available to the public unless Respondents conform with applicable New York law and regulations regarding confidentiality. Respondents shall not assert a claim of confidentiality regarding any monitoring or hydrogeologic data, any information specified under Section 104(e)(7)(F) of CERCLA, or any other chemical, scientific or engineering data relating to the Work performed hereunder.

Off-Site Shipments

64. All hazardous substances, pollutants, or contaminants removed from the Site pursuant to this Order for off-site treatment, storage, or disposal shall be treated, stored, or

disposed of in compliance with (a) Section 121(d)(3) of CERCLA, 42 U.S.C. §9621(d)(3), (b) the EPA "Revised Procedures for Implementing Off-Site Response Actions," OSWER Directive Number 9834.11, November 13, 1987, (c) the EPA "Superfund Removal Procedures" (OSWER 1988), (d) RCRA, (e) the Toxic Substances Control Act ("TSCA"), 15 U.S.C. §2601, et seq., and (f) all other applicable federal and state requirements.

65. If hazardous substances from the Site are to be shipped outside of New York State, Respondents shall provide prior notification of such out-of-state waste shipments in accordance with OSWER Directive 9330.2-07. At least five (5) working days prior to out-of-state waste shipments, Respondents shall notify the environmental agency of the accepting state of the following: (a) the name and location of the facility to which the wastes are to be shipped; (b) the type and quantity of waste to be shipped; (c) the expected schedule for the waste shipments; (d) the method of transportation and name of transporter; and (e) treatment and/or disposal method of the waste streams.

66. Certificates of destruction for wastes that are destroyed must be provided to EPA upon Respondents' receipt of such. These certificates must be included in the biweekly progress reports.

Compliance With Other Laws

67. All actions required pursuant to this Order shall be performed in accordance with all applicable local, state, and federal laws and regulations except as provided in CERCLA §121(e)(1), 42 U.S.C. §9621(e)(1), and 40 CFR §300.415(i). In accordance with 40 CFR §300.415(i), all on-Site actions required pursuant to this Order shall, to the extent practicable, as determined by EPA, considering the exigencies of the situation, attain applicable or relevant and appropriate requirements ("ARARs") under federal environmental or state environmental or facility siting laws. (See "Superfund Removal Procedures: Guidance on the Consideration of ARARs During Removal Actions," OSWER Directive No. 9360.3-02, August 1991).

68. Except as provided in Section 121(e)(1) of CERCLA, 42 U.S.C. §9621(e)(1), and the NCP, no permit shall be required for any portion of the Work required hereunder that is conducted entirely on-Site. Where any portion of the Work requires a federal or state permit or approval, Respondents shall submit timely applications and shall take all other actions necessary to obtain and to comply with all such permits or approvals. This Order is not, nor shall it be construed to be, a permit issued pursuant to any federal or state statute or regulation.

Emergency Response and Notification of Releases

69. Upon the occurrence of any event during performance of the

Work required hereunder which, pursuant to Section 103 of CERCLA, 42 U.S.C. §9603, requires reporting to the National Response Center [(800) 424-8802], Respondents shall also immediately orally notify the Chief of the Removal Action Branch of the Emergency and Remedial Response Division of EPA, Region II, at (908) 321-6621, or the EPA Region II Emergency 24-hour Hot Line at (908) 548-8730, of the incident or Site conditions. Respondents shall also submit a written report to EPA within seven (7) days after the onset of such an event, setting forth the events that occurred and the measures taken or to be taken, if any, to mitigate any release or endangerment caused or threatened by the release and to prevent the reoccurrence of such a release. The reporting requirements of this paragraph are in addition to, not in lieu of, reporting under CERCLA Section 103, 42 U.S.C. §9603, and Section 304 of the Emergency Planning and Community Right-To-Know Act of 1986, 42 U.S.C. § 11004.

70. In the event of any action or occurrence during Respondents' performance of the requirements of this Order which causes or threatens to cause a release of a hazardous substance or which may present an immediate threat to public health or welfare or the environment, Respondents shall immediately take all appropriate action to prevent, abate, or minimize the threat if that threat is related to the Work described in paragraph 33 of this Order and shall immediately notify EPA as provided in the preceding paragraph. Respondents shall take such action in accordance with applicable provisions of this Order including, but not limited to, the Health and Safety Plan. In the event that EPA determines that (a) the activities performed pursuant to this Order, (b) significant changes in conditions at the Site, or (c) emergency circumstances occurring at the Site pose a threat to human health or the environment, EPA may direct Respondents to stop further implementation of any actions pursuant to this Order or to take other and further actions reasonably necessary to abate the threat.

71. Nothing in the preceding paragraph shall be deemed to limit any authority of the United States to take, direct, or order all appropriate action to protect human health and the environment or to prevent, abate, or minimize an actual or threatened release of hazardous substances on, at, or from the Site.

Delay in Performance

72. Any delay in performance of this Order that, in EPA's judgment, is not properly justified by Respondents under the terms of paragraph 73 below, shall be considered a violation of this Order. Any delay in performance of this Order shall not affect Respondents' obligations to perform all obligations fully under the terms and conditions of this Order.

73. Respondents shall notify EPA of any delay or anticipated delay in performing any requirement of this Order. Such notification shall be made by telephone to EPA's OSC within forty-eight (48) hours after Respondents first knew or should have known that a delay might occur. Respondents shall adopt all reasonable measures to avoid or minimize any such delay. Within five (5) business days after notifying EPA by telephone, Respondents shall provide written notification fully describing the nature of the delay, any justification for the delay, any reason why Respondents should not be held strictly accountable for failing to comply with any relevant requirements of this Order, the measures planned and taken to minimize the delay, and a schedule for implementing the measures that have been or will be taken to mitigate the effect of the delay. Increased cost or expense associated with the implementation of the activities called for in this Order is not a justification for any delay in performance.

Enforcement and Reservation of Rights

74. Notwithstanding any other provision of this Order, failure of Respondents to comply with any provision of this Order may subject Respondents to civil penalties of up to twenty-five thousand dollars (\$25,000) per violation per day, as provided in Section 106(b)(1) of CERCLA, 42 U.S.C. § 9606(b)(1). Respondents may also be subject to punitive damages in an amount at least equal to and not more than three times the amount of any costs incurred by the United States as a result of such failure to comply with this Order, as provided in Section 107(c)(3) of CERCLA, 42 U.S.C. § 9607(c)(3). Should Respondents violate this Order or any portion thereof, EPA may carry out the required actions unilaterally, pursuant to Section 104 of CERCLA, 42 U.S.C. § 9604, and/or may seek judicial enforcement of this Order pursuant to Section 106 of CERCLA, 42 U.S.C. § 9606.

75. Nothing herein shall limit the power and authority of EPA or the United States to take, direct, or order all actions necessary to protect public health, welfare, or the environment or to prevent, abate, or minimize an actual or threatened release of hazardous substances, pollutants or contaminants, or hazardous or solid waste on, at, or from the Site. Further, nothing herein shall prevent EPA from seeking legal or equitable relief to enforce the terms of this Order, from taking other legal or equitable action as it deems appropriate, or from requiring the Respondents in the future to perform additional activities pursuant to CERCLA or any other applicable law. EPA reserves the right to bring an action against Respondents under Section 107 of CERCLA, 42 U.S.C. § 9607, for recovery of any response costs incurred by the United States related to this Order or the Site.

Other Claims

76. By issuance of this Order, the United States and EPA assume no liability for injuries or damages to persons or property resulting from any acts or omissions of Respondents or Respondents' employees, agents, contractors, or consultants in carrying out any action or activity pursuant to this Order. The United States or EPA shall not be held out as or deemed a party to any contract entered into by the Respondents or their directors, officers, employees, agents, successors, representatives, assigns, contractors, or consultants in carrying out actions pursuant to this Order.

75. Nothing in this Order constitutes or shall be construed as a satisfaction of or release from any claim or cause of action against the Respondents or any person not a party to this Order for any liability that Respondents or other persons may have under CERCLA, other statutes, or the common law, including but not limited to any claims of the United States for injunctive relief, costs, damages, and interest under Sections 106(a) and 107 of CERCLA, 42 U.S.C. §§ 9606(a) and 9607. Nothing herein shall constitute a finding that Respondents are the only responsible parties with respect to the release and threatened release of hazardous substances at and from the Site.

76. Nothing in this Order shall affect any right, claim, interest, defense, or cause of action of any party hereto with respect to third parties.

77. Nothing in this Order shall be construed to constitute preauthorization under Section 111(a)(2) of CERCLA, 42 U.S.C. § 9611(a)(2), and 40 CFR § 300.700(d).

Insurance

78. At least seven (7) days prior to commencing any Work at the Site, Respondents shall submit to EPA a certification that Respondents or their contractors and subcontractors have adequate insurance coverage or have indemnification for liabilities for injuries or damages to persons or property which may result from the activities to be conducted by or on behalf of Respondents pursuant to this Order. Respondents shall ensure that such insurance or indemnification is maintained for the duration of the Work required by this Order.

Modifications

79. No informal advice, guidance, suggestion, or comment by EPA regarding reports, plans, specifications, schedules, or any other

writing submitted by the Respondents shall relieve Respondents of their obligation to obtain such formal approval as may be required by this Order and to comply with all requirements of this Order unless it is formally modified.

Notice of Intent to Comply

80. Respondents shall provide, not later than seven (7) days after the effective date of this Order, written notice to EPA stating whether they will comply with the terms of this Order and specifying Respondents' proposed manner of compliance with this Order. Respondents' written notice shall describe, using facts that exist on or prior to the effective date of this Order, any "sufficient cause" defenses asserted by Respondents under Sections 106(b) and 107(c)(3) of CERCLA. Respondents' written notice shall be sent by certified mail to the Frontier Chemical Site Attorney at the address listed in paragraph 50, above. The absence of a response by EPA to the notice required by this paragraph shall not be deemed to be an acceptance of Respondents' assertions.

Termination and Satisfaction

81. Upon a determination by EPA (following its receipt of the Final Report referred to in paragraph 51, above) that the Work required pursuant to this Order has been fully carried out in accordance with this Order, EPA will so notify Respondents in writing.

Opportunity to Confer, Effective Date

82. This Order shall be effective six (6) days after receipt by Respondents, unless a conference is timely requested pursuant to paragraph 83, below. If such a conference is timely requested, this Order shall become effective one (1) day following the date the conference is held, unless the effective date is modified by EPA. All times for performance of ordered activities shall be calculated from this effective date.


83. Respondents may, within five (5) days after receipt of this Order, request a conference with EPA to discuss this Order. If requested, the conference shall occur within three (3) days of Respondents' request for a conference.

84. The purpose and scope of the conference shall be limited to issues involving the implementation of the work required by this Order and the extent to which Respondents intend to comply with this Order. This conference is not an evidentiary hearing, and does not constitute a proceeding to challenge this Order. It does not give Respondents a right to seek review of this Order or

to seek resolution of potential liability, and no official stenographic record of the conference will be made. At any conference held pursuant to Respondents' request, Respondents may appear in person or by an attorney or other representative.

85. A request for a conference must be made by telephone to Elena T. Kissel, Esq., Assistant Regional Counsel, Office of Regional Counsel, EPA Region II, telephone (212) 264-4877, followed by written confirmation mailed that day to Ms. Kissel (the Frontier Chemical Site Attorney) and the OSC at the addresses set forth in paragraph 50 of this Order.

U.S. ENVIRONMENTAL PROTECTION AGENCY



Jeanne M. Fox
Regional Administrator
U.S. Environmental Protection Agency
Region II

9/30/94
Date of Issuance

APPENDIX I
FRONTIER CEMICAL SITE
Niagara Falls, New York

TANK SPECIFICATIONS AND CONTENT DESCRIPTIONS

TANK ID	TANK TYPE	TANK CAPACITY GALLONS	LIQUID VOLUME IN TANK/GALLONS	SOLIDS VOLUME IN TANK/GALLONS	TOTAL VOLUME IN TANK/GALLONS	TANK CONTENT DESCRIPTION	PLANT PROCESS
T-70	STEEL	10000	3600	0	3600	CAUSTIC LIQUIDS	RAW PRODUCT
T-72	STEEL	10000	50	800	850	SODIUM BISULFATE	RAW PRODUCT
T-73	STEEL	10000	50	900	950	SODIUM BISULFATE	RAW PRODUCT
T113	FRP	5083	0	0	0	EFFLUENT FROM DEWATERING (VOLUME VARIES)	WTT ONSITE
T116	FRP	1570	0	0	0	SURGE TANK FROM GAC TO T-1 & T-2 (VOLUME VARIES)	WTT ONSITE
BOXES	FIBER	30	0	30	30	FILTER CAKE	FILTER PRESS
F-A	STEEL	0	0	940	940	SAND FILTER TREATMENT	WTT ONSITE
F-B	STEEL	0	0	940	940	SAND FILTER TREATMENT	WTT ONSITE
F-D	FRP	0	0	250	250	PORTABLE SAND FILTER (GAC)	WTT ONSITE
R101	FRP	13800	13445	355	13800	NEUTRALIZED CYANIDE WASTES	WASTEWATER
R102	FRP	13750	10535	1465	12000	NEUTRALIZED CYANIDE WASTES	WASTEWATER
R301	FRP	5943	5000	0	5000	CYANIDE WASTES	CN/S OXIDATION
R302	FRP	5943	5500	155	5655	CYANIDE WASTES	CN/S OXIDATION
S101	STEEL	12200	0	6000	6000	DRY LIME	RAW PRODUCT
T-1	STEEL	105200	0	2645	2645	POST GAC AQUEOUS	WTT ONSITE
T-2	STEEL	102950	0	2645	2645	POST GAC AQUEOUS	WTT ONSITE
T101	STEEL	51700	31530	6070	37600	LOW TOC FOR ON-SITE TREATMENT	WTT ONSITE
T102	STEEL	51700	31325	8625	39950	HIGH TOC FOR OFF-SITE TREATMENT	FUELS BLENDING
T103	FRP	20300	16710	210	16920	ACID WASTES-NEUTRALIZED	WASTEWATER
T105	POLY	3354	1900	0	1900	INORGANIC ACIDS	WASTEWATER
T106	STEEL	5860	4085	195	4280	SODIUM BISULFITE	RAW PRODUCT
T108	STEEL	6290	2620	1835	4455	LIME SLURRY	RAW PRODUCT
T110	STEEL	17032	10010	4795	14805	NEUTRALIZED FILTER FEED	WASTEWATER
T111	STEEL	17032	15230	0	15230	NEUTRALIZED FILTER FEED	WASTEWATER
T112	STEEL	12267	140	1695	1835	NON-HAZ LIQUID	WTT ONSITE
T114	FRP	4888	2975	30	3005	HYDROCHLORIC ACID	RAW PRODUCT
T115	FRP	7460	3295	835	4130	OFF SPEC FILTER CAKE	WASTEWATER
T117	POLY	201	0	20	20	MAGNESIUM HYDROXIDE OR LIME SLURRY	RAW PRODUCT
T119	STEEL	5480	625	0	625	MAGNESIUM HYDROXIDE OR LIME SLURRY	RAW PRODUCT
T201	STEEL	18190	11000	5500	16500	SOLVENT HALOGENATED/NON-HALOGENATED, OIL MIXTURE, OR HIGH TOC	FUELS BLENDING
T202	STEEL	18190	11000	2115	13115	SOLVENT HALOGENATED/NON-HALOGENATED, OIL MIXTURE, OR HIGH TOC	FUELS BLENDING

FRONTIER CEMICAL SITE
Niagara Falls, New York

TANK SPECIFICATIONS AND CONTENT DESCRIPTIONS

TANK ID	TANK TYPE	TANK CAPACITY GALLONS	LIQUID VOLUME IN TANK/GALLONS	SOLIDS VOLUME IN TANK/GALLONS	TOTAL VOLUME IN TANK/GALLONS	TANK CONTENT DESCRIPTION	PLANT PROCESS
T203	STEEL	18190	8460	8035	16495	SOLVENT HALOGENATED/NON-HALOGENATED, OIL MIXTURE, OR HIGH TOC	FUELS BLENDING
T204	STEEL	18190	4440	1480	5920	SOLVENT HALOGENATED/NON-HALOGENATED, OIL MIXTURE, OR HIGH TOC	FUELS BLENDING
T205	S.S.	31695	6790	20375	27165	BLENDED FUELS	FUELS BLENDING
T206	S.S.	31695	18680	8490	27170	BLENDED FUELS	FUELS BLENDING
T207	STEEL	48365	34140	8445	42585	CHLORINATED SOLVENTS	FUELS BLENDING
T209	STEEL	20304	15225	2960	18185	NON-HAZ HIGH TOC OIL/WATER	FUELS BLENDING
T210	STEEL	1100	1000	100	1100	SLUDGE/SOLVENT MIXTURES	FUELS BLENDING
T215	STEEL	16920	0	1060	1060	RAIN H2O/SPILLED FUEL FROM SUMPS	WTT ONSITE
T301	FRP	7500	6760	470	7230	CYANIDE WASTES	CN/S OXIDATION
T302	FRP	7700	7700	0	7700	CYANIDE WASTES	CN/S OXIDATION
T303	FRP	10000	8790	295	9085	CYANIDE WASTES FOR	CN/S OXIDATION
T304	FRP	11980	1805	0	1805	SODIUM HYPOCHLORITE	RAW PRODUCT
T305	FRP	11980	2830	0	2830	SODIUM HYPOCHLORITE	RAW PRODUCT
T306	FRP	10000	2245	490	2735	SODIUM HYPOCHLORITE	RAW PRODUCT
T307	FRP	13950	7425	1565	8990	CYANIDE WASTES	CN/S OXIDATION
TT249	STEEL	6000	6000	0	6000	OFF SPEC FUEL	FUELS BLENDING
TT256	FRP	5234	5200	0	5200	OFF SPEC FUEL	FUELS BLENDING
V-1	STEEL	20000	0	7833	7833	GRANULAR ACTIVATED CARBON UNITS (GAC)	WTT ONSITE
V-2	STEEL	20000	0	7833	7833	GRANULAR ACTIVATED CARBON UNITS (GAC)	WTT ONSITE
*** Total ***			318115	118481	436596		

APPENDIX II

Recipients of Administrative Order on Consent Index No. II-CERCLA-94-0205

Appalachian Electronic Instruments,
Inc.
Auburn Technology, Inc.
BCE/CH Holding Corp.
Blue Grass Chemical Specialties, L.P.
Bovano Industries, Inc.
Buckham Transport, Ltd.
Buffalo Color Corporation
Bus Industries, Inc.
Carrier Corporation
Component Technologies, Inc.
Corning Inc.
Cyprus Foote Mineral Co.
Cytec Industries Inc. (on behalf of
American Cyanamid Company)
Elf Atochem North America
Enviro-Tank Clean, Inc.
Environmental Waste Resources, Inc.
Fisher Industrial Service, Inc.
II-VI, Inc.
Keystone Carbon Company
Lapp Insulator Company
Marc Equity Realty Associates
Matheson Gas Products, Inc.
Morrill Press, Inc.
Niagara Mohawk Power Corporation
Phelps Dodge Industries, Inc. D/B/A
Phelps Dodge Specialty
Copper Products Co.
Pollution Solutions of Vermont, Inc.
Revere Copper Products, Inc.
Ryder Automotive Operations, Inc.
(on behalf of Murray Recon, Inc.)
Schweizer Aircraft Corp.
Seneca Wire & Mfg. Company (Athenia
Wire)
Solvents & Petroleum Service, Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

IN THE MATTER OF THE
FRONTIER CHEMICAL SUPERFUND SITE,
NIAGARA FALLS, NEW YORK

Proceeding under Section 122(g)(4)
of the Comprehensive Environmental
Response, Compensation, and
Liability Act of 1980, as amended,
42 U.S.C. §9622(g)(4)

ADMINISTRATIVE ORDER
ON CONSENT

U.S. EPA Index No.
II-CERCLA-94-0206

I. JURISDICTION

1. This Administrative Order on Consent ("Consent Order" or "Order") is issued pursuant to the authority vested in the President of the United States by Section 122(g)(4) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986 ("CERCLA"), 42 U.S.C. §9622(g)(4), in order to settle specified EPA claims under Section 106(a) or 107(a) of CERCLA, 42 U.S.C. §§9606(a) or 9607(a). The authority vested in the President has been delegated to the Administrator of the United States Environmental Protection Agency ("EPA") by Executive Order 12580, 52 Fed. Reg. 2923 (Jan. 29, 1987), and further delegated to the Regional Administrators of EPA by EPA Delegation No. 14-14-E (issued Sept. 13, 1987, amended by memorandum June 17, 1988).

2. This Consent Order is issued to each entity identified in Appendix I ("Respondents"). Appendix I is incorporated herein by reference. This Consent Order provides for the contribution of the Respondents for the Tank Phase Removal Action, Tank Phase Oversight Costs and Past Response Costs, as defined in this Order, which have been or will be conducted or incurred in response to releases or threatened releases of hazardous substances, pollutants or contaminants at the Frontier Chemical Superfund Site in Niagara Falls, New York (the "Site").

3. This Consent Order was executed by EPA and the Respondents in good faith to avoid the expense and delay of litigation over the matters addressed by this Consent Order. Each Respondent agrees to undertake all actions required by the terms and conditions of this Consent Order. Each Respondent further consents to and will not contest EPA's jurisdiction to issue this Consent Order or to implement or enforce its terms.

4. EPA and the Respondents agree that this Consent Order is entered into without any admission of liability for any purpose as to any matter arising out of the transactions or occurrences alleged in the Order.

II. PARTIES BOUND

5. This Consent Order shall apply to and be binding upon EPA and each Respondent and its successors and assigns. Each signatory to this Consent Order represents that he or she is fully authorized to enter into the terms and conditions of this Consent Order and to legally bind the party represented by him or her. Any change in ownership or corporate status of a Respondent, including, but not limited to, any transfer of assets

or real or personal property, shall in no way alter such Respondent's responsibilities under this Consent Order.

III. DEFINITIONS

6. Unless otherwise expressly provided herein, terms used in this Consent Order that are defined in CERCLA or in regulations promulgated under CERCLA shall have the meaning assigned to them in the statute or regulations. Whenever the terms listed below are used in this Order, including the attached appendices, the following definitions shall apply:

a. "CERCLA" shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. §§9601, et seq.

b. "Consent Order" or "Order" shall mean this Administrative Order on Consent and all appendices attached hereto. In the event of conflict between this Order and any appendix, the Order shall control.

c. "EPA" shall mean the United States Environmental Protection Agency and any successor departments or agencies.

d. "Paragraph" shall mean a portion of this Consent Order identified by an Arabic numeral.

e. "Parties" shall mean "EPA" and the "Respondents."

f. "Past Response Costs" shall mean those response costs which have been and will be incurred by EPA with respect to the Site through June 1, 1994 and which are not to be reimbursed pursuant to EPA's September 30, 1993 Administrative Order on Consent, Index No. II CERCLA-93-0207.

g. "Respondent" or "Respondents" shall mean those persons, corporations, and other entities listed in Appendix I.

h. "Section" shall mean a portion of this Consent Order identified by a Roman numeral.

i. "Site" shall mean the Frontier Chemical Superfund Site, located at 4626 Royal Avenue in Niagara Falls, New York.

j. "Tank Phase Oversight Costs" shall mean: (a) all response costs which are incurred by EPA in overseeing the implementation by certain potentially responsible parties (the "Performing PRPs") of the Tank Phase Removal Action; (b) all response costs which are incurred by EPA in connection with obtaining access needed by the Performing PRPs for implementation of the Tank Phase Removal Action; and (c) all other response

costs which are incurred by EPA in connection with the implementation of EPA's Administrative Order Index No. II-CERCLA-94-0205.

k. "Tank Phase Removal Action" shall mean the removal action which EPA expects to be conducted at the Site in 1994 and which is to involve the removal and disposal of the contents of the tanks located at the Site, and such activities as are determined to be appropriate to provide Site maintenance and Site security from June 1, 1994 until the tank contents have been removed and disposed of. The Tank Phase Removal Action encompasses the response activities to be carried out by the Performing PRPs pursuant to EPA's Administrative Order Index No. II-CERCLA-94-0205.

l. "Tanks" means all bulk storage vessels at the Site, including, but not limited to, steel tanks, fiberglass tanks, bulk storage boxes, tank trailers, reactor vessels, and wastewater treatment carbon and sand filters.

m. "United States" shall mean the United States of America, its agencies, departments, and instrumentalities.

IV. EPA'S FINDINGS OF FACT

7. The Site is located at 4626 Royal Avenue in Niagara Falls, Niagara County, New York. The Site includes a former hazardous waste processing facility located within a heavily industrialized section of Niagara Falls. It includes a portion of the property represented on the Lockport, New York Tax Map as Lots 47 and 48, Parcels A and B (the "Site Property"). The Site includes approximately 9.7 acres.

8. The Site Property is owned by Francis Williams, James H. Williams and Lawrence Reger, formerly doing business under the name of Niagara Industrial Warehousing and currently doing business under the name of Marc Equity Realty Associates.

9. Frontier Chemical Waste Process, Inc. ("Frontier"), a corporation organized and existing under the laws of the State of New York, leased the Site Property and, from 1974 until 1992, operated a business at the Site which was primarily engaged in hazardous waste processing/management, including wastewater treatment, fuels blending and bulking for off-site disposal.

10. On or about August 13, 1991, Eagle Vision Environmental Inc. ("Eagle Vision"), a Colorado-chartered, Florida-based corporation, assumed responsibility for the day-to-day management of operations at the Site.

11. On December 4, 1992, the New York State Department

of Environmental Conservation ("NYSDEC") Commissioner, Thomas C. Jorling, signed a "Modification to Summary Abatement Order and Notice of Hearing" (hereinafter, "NYSDEC Order") pertaining to the Site. The NYSDEC Order required Frontier and Eagle Vision to submit a schedule for the removal of all waste from the Site, to submit Demolition and Closure Plans for certain buildings at the Site and to establish escrow accounts as security for non-payment of utility bills and employee salaries within a fixed amount of time or close the facility. The NYSDEC Order also enabled NYSDEC to initiate an emergency removal action to be conducted by either NYSDEC or EPA in the event that the parties failed to meet the terms of the NYSDEC Order. Frontier waived its right to a hearing and Eagle Vision subsequently notified NYSDEC that it was not able to comply with the terms of the NYSDEC Order. NYSDEC issued a Right to Invoke Action ("RIA") based upon Frontier and Eagle Vision's noncompliance with the terms of the NYSDEC Order. The RIA stated that NYSDEC and EPA were invoking their right to enter the facility and initiate appropriate emergency removal actions.

12. Pursuant to administrative orders issued by EPA on September 30, 1993 (Index No.'s II-CERCLA-93-0207 and II-CERCLA-93-0218), certain potentially responsible parties are performing a removal action involving the removal of drums and laboratory chemicals at the Site.

13. There are forty-five tanks presently located at the Site, which contain a variety of hazardous substances, within the meaning of Section 101(14) of CERCLA. The hazardous substances in the tanks include cyanides, D002 acids ($\text{pH} < 2$), D002 bases ($\text{pH} > 12.5$), F001 and F002 halogenated solvents, F003 and F005 non-halogenated solvents, and F-and-D-listed flammable liquids.

14. Actual releases of hazardous substances have occurred at the Site in that, among other things, hazardous substances have leaked from tanks at the Site, and there is a continuing threat of further releases at the Site.

15. In response to the release and threat of release of hazardous substances at the Site, EPA has undertaken response activities at the Site under Section 104 of CERCLA, 42 U.S.C. §9604. These response activities include, but are not limited to, repairing leaking tanks; maintaining boilers that supply steam to the steam tracer lines, process lines and heat to the drum storage buildings; maintaining compressors which are essential to the fire control system on-site; pumping storm waters from containment areas through the on-site carbon absorption system and into storage tanks, pending approval for discharge; and performing regularly scheduled inspections to examine the structural integrity of drums and tanks.

16. In performing response actions at the Site, EPA has incurred and will continue to incur response costs at or in connection with the Site through at least the date of completion of the Tank Phase Removal Action. EPA's Past Response Costs total approximately \$1,009,219.

17. EPA expects to issue an administrative order in 1994 under Section 106(a) of CERCLA, requiring certain potentially responsible parties other than the Respondents to perform the Tank Phase Removal Action. The projected cost of the Tank Phase Removal Action is \$3,624,000. This estimate includes contingencies for cost overruns. EPA also projects that it will incur approximately \$80,000 in Tank Phase Oversight Costs.

18. Information currently known to EPA indicates that each Respondent listed in Appendix I to this Consent Order arranged for disposal or treatment at the Site, or arranged with a transporter for transport for disposal or treatment at the Site, of a hazardous substance owned or possessed by such Respondent.

19. EPA has identified generators of hazardous substances currently contained in the tanks at the Site, and has prepared the Volumetric Ranking attached hereto as Appendix II, which ranks those generators in order of their relative contribution of waste to the tanks. Information currently known to EPA indicates that each Respondent contributed less than .5% of the hazardous substances currently contained in the tanks at the Site, and that the hazardous substances contributed by each Respondent to the tanks at the Site are not significantly more toxic or of significantly greater hazardous effect than other hazardous substances currently in the tanks.

20. In evaluating the settlement embodied in this Consent Order, EPA has considered the potential costs of the Tank Phase Removal Action at the Site, taking into account possible cost overruns. Payments required to be made by each Respondent pursuant to this Consent Order are a minor portion of the sum of: a) the projected cost of the Tank Phase Removal Action; b) the projected Tank Phase Oversight Costs; and c) EPA's Past Response Costs.

V. DETERMINATIONS

21. Based upon the Findings of Fact set forth above and the administrative record for this Site, EPA has determined that:

a. The Frontier Chemical Superfund Site is a "facility" as that term is defined in Section 101(9) of CERCLA, 42 U.S.C. §9601(9).

b. Each Respondent is a "person" as that term is defined in Section 101(21) of CERCLA, 42 U.S.C. §9601(21).

c. Each Respondent is a potentially responsible party within the meaning of Sections 107(a) and 122(g)(1) of CERCLA, 42 U.S.C. §§9607(a) and 9622(g)(1).

d. There has been an actual or threatened "release" of a hazardous substance from the Site, as that term is defined in Section 101(22) of CERCLA, 42 U.S.C. §9601(22).

e. Prompt settlement with the Respondents is practicable and in the public interest within the meaning of Section 122(g)(1) of CERCLA, 42 U.S.C. §9622(g)(1).

f. Of the hazardous substances currently in the tanks at the Site, the amount contributed by each Respondent and the toxic or other hazardous effects of the hazardous substances contributed by each Respondent are minimal in comparison to other hazardous substances in the tanks, as required by Section 122(g)(1)(A) of CERCLA, 42 U.S.C. §9622(g)(1)(A).

VI. ORDER

22. Based upon the administrative record for this Site and the Findings of Fact and Determinations set forth above, and in consideration of the promises and covenants set forth herein, it is hereby AGREED AND ORDERED as follows.

VII. PAYMENT

23. Each Respondent shall pay the amount set forth in the column opposite its name in Appendix I to this Consent Order in accordance with the provisions of this Section. The total amount to be paid by each Respondent represents each Respondent's volumetric percentage (as shown on the Volumetric Ranking attached hereto as Appendix II) of: (a) EPA's Past Response Costs and projected Tank Phase Oversight Costs; and (b) the projected costs of the Tank Phase Removal Action.

24. Within 30 days of the effective date of this Order, each Respondent shall pay to EPA the amount set forth in the column opposite its name in Appendix I to this Order. Each payment shall be made by certified or cashier's check made payable to "EPA Hazardous Substance Superfund". Each check shall reference the Site name, the name and address of the Respondent, and the EPA index number of this Consent Order, and shall be sent to:

EPA Region II
Attn: Superfund Accounting
P.O. Box 360188M
Pittsburgh, PA 15251

Each Respondent shall simultaneously send a copy of its check to:

Kevin Matheis
U.S. Environmental Protection Agency
2890 Woodbridge Avenue
Bldg. 209 (MS-211)
Edison, NJ 08837

Attention: Frontier Chemical Site On-Scene
Coordinator

and

Chief, New York/Caribbean Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency
26 Federal Plaza, Room 437
New York, New York 10278

Attention: Frontier Chemical Site Attorney

VIII. CIVIL PENALTIES

25. In addition to any other remedies or sanctions available to EPA, any Respondent who fails or refuses to comply with any term or condition of this Consent Order shall be subject to a civil penalty of up to \$25,000 per day for each failure or refusal pursuant to Sections 109 and 122(1) of CERCLA, 42 U.S.C. §§9609 and 9622(1).

IX. CERTIFICATION OF RESPONDENTS

26. Each Respondent certifies individually that it is not aware of any information indicating that the volumetric percentage attributed to it under the Volumetric Ranking attached hereto as Appendix II is inaccurate.

X. COVENANTS BY EPA

27. In consideration of the payments that will be made by the Respondents under the terms of this Consent Order, and except as specifically provided in Section XII of this Consent

Order, EPA covenants not to sue or take administrative action against any of the Respondents pursuant to Sections 106(a) or 107(a) of CERCLA, 42 U.S.C. §§9606(a) or 9607(a), for performance of or payment for the Tank Phase Removal Action at the Site and for recovery of Past Response Costs and Tank Phase Oversight Costs. These covenants not to sue shall take effect with respect to each Respondent upon the receipt by EPA of the payment from that Respondent required by Section VII of this Consent Order. With respect to each Respondent, these covenants not to sue are conditioned upon the complete and satisfactory performance by that Respondent of its obligations under this Consent Order. These covenants not to sue extend only to the Respondents and their successors and do not extend to any other person.

XI. COVENANTS NOT TO SUE BY RESPONDENTS

28. The Respondents covenant not to sue and agree not to assert any claims or causes of action against the EPA Hazardous Substance Superfund or the United States or its agencies, officers, employees or representatives (including, but not limited to, any direct or indirect claim pursuant to Sections 106(b)(2), 107, 111, 112, and/or 113 of CERCLA, 42 U.S.C. §§9606(b)(2), 9607, 9611, 9612, 9613) with respect to the Tank Phase Removal Action, Past Response Costs, Tank Phase Oversight Costs, or this Consent Order.

29. Nothing in this Consent Order shall be deemed to constitute preauthorization of a claim within the meaning of Sections 111 or 112 of CERCLA, 42 U.S.C. §§9611 and 9612, or 40 C.F.R. §300.700(d).

XII. RESERVATIONS OF RIGHTS

30. The Covenants Not to Sue by EPA set forth in Section X of this Consent Order do not pertain to any matters other than those expressly specified therein. The United States, including EPA, reserves, and this Consent Order is without prejudice to, all rights against Respondents with respect to all other matters, including but not limited to the following:

a) claims based on a failure to make the payments required by Section VII of this Consent Order;

b) criminal liability;

c) liability for damages for injury to, destruction of, or loss of natural resources;

d) liability for costs, including the reasonable costs of assessing natural resource damages, that have been or may in the

future be incurred by the U.S. Department of the Interior or any other trustees for natural resources relating to the Site;

e) liability arising from the past, present, or future disposal, release or threat of release of hazardous substances outside of the Site;

f) liability for violations of federal or state law other than those that are addressed under this Consent Order.

31. Nothing in this Consent Order constitutes a covenant not to sue or to take action or otherwise limits the ability of the United States, including EPA, to seek or obtain further relief from any Respondent if information not currently known to EPA is discovered which indicates that any Respondent contributed hazardous substances to the tanks at the Site in such greater amount or of such greater toxic or other hazardous effects that the Respondent no longer qualifies as a de minimis party with respect to the tanks at the Site because the Respondent contributed .5% or more of the hazardous substances currently contained in the tanks or contributed hazardous substances to the tanks which are significantly more toxic or of significantly greater hazardous effect than other hazardous substances currently in the tanks.

XIII. EFFECT OF SETTLEMENT; CONTRIBUTION PROTECTION

32. Nothing in this Consent Order shall be construed to create any rights in, or grant any cause of action to, any person not a party to this Consent Order. The preceding sentence shall not be construed to waive or nullify any rights that any person not a signatory to this Consent Order may have under applicable law. The United States, including EPA, and the Respondents each reserve any and all rights (including, but not limited to, any right to contribution), defenses, claims, demands, and causes of action which each party may have with respect to any matter, transaction, or occurrence relating in any way to the Site against any person not a party hereto.

33. The Parties agree that the actions undertaken by the Respondents in accordance with this Consent Order do not constitute an admission of any liability for any purpose by any Respondent.

34. With regard to claims for contribution against each Respondent for matters addressed by this Consent Order, the Parties hereto agree that each Respondent is entitled, as of the effective date of this Consent Order, to such protection from contribution actions or claims as is provided by Sections 113(f)(2) and 122(g)(5) of CERCLA, 42 U.S.C. §§9613(f)(2) and 9622(g)(5).

XIV. PUBLIC COMMENT

35. This Consent Order shall be subject to a thirty-day public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. §9622(i). In accordance with Section 122(i)(3) of CERCLA, 42 U.S.C. §9622(i)(3), EPA may withdraw consent to this Consent Order if comments received disclose facts or considerations which indicate that the terms, conditions or provisions of this Consent Order are inappropriate, improper, or inadequate.

XV. ATTORNEY GENERAL APPROVAL

36. The Attorney General or her designee has issued prior written approval of the settlement embodied in this Consent Order in accordance with Section 122(g)(4) of CERCLA, 42 U.S.C. §9622(g)(4).

XVI. EFFECTIVE DATE

37. The effective date of this Consent Order shall be the date upon which EPA issues written notice to the Respondents that the public comment period pursuant to Section XIV of this Consent Order has closed and that comments received, if any, do not require modification of or EPA withdrawal from this Consent Order.

IT IS SO AGREED AND ORDERED:

U.S. Environmental Protection Agency

By:

Jeanne M. Fox
Jeanne M. Fox
Regional Administrator
U.S. Environmental Protection Agency
Region II

9/30/94
Date

Frontier Chemical Site
Niagara Falls, New York
Appendix I

DE MINIMIS GENERATOR ALLOCATIONS FOR CURRENT TANK VOLUMES

Respondents	Payment Amounts (\$)
A.B. CHANCE	1602
A.B. DICK CO	2404
ABB KENT-TAYLOR	1602
ACCO CHAIN & LIFTING PRODUCTS	801
ADCO PRODUCTS	1602
ADTEC INDUSTRIES	6457
AEROQUIP CORPORATION	801
AEROTECH, INC	1602
ALLEGHENY BRADFORD	4855
ALUMAX MILL PRODUCTS, INC	4053
APS/TELEFLEX	6457
ARCATA GRAPHICS	801
ARVIN CALSPAN CORP	12537
ASSOCIATION FOR RETARDED CITIZENS ARC/FUTREL	1602
BARRE ENGRAVING CO	801
BATTERY ENGINEERING, INC	6080
BCM ENGINEERING LAB DIV	4053
BECON, INC	4855
BELOIT MANHATTAN, INC	15365
BETTS INDUSTRIES	3252
BLACKHAWK MACHINE & TOOL	801
BOVIE SCREEN PROCESS PRINTING CORP	1602
BROWN STREET FURNITURE	2404
C.B. CUMMINGS & SONS, INC	1602
CADBURY BEVERAGES, INC	1602
CARBIDE/GRAPHITE GROUP, INC	3252
CECIL I. WALKER MACHINERY CO	801
CHAIRMASTERS, INC	4053
CHALLENGE MANUFACTURING	2404
CHAMPAGNE OFFSET	1602
CHAMPION PRODUCTS, INC	13715
CHEMCLENE CORP	801
CHEMICAL LEAMAN TANK LINE INC	2404
CHURCH & DWIGHT CO	801

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DE MINIMIS GENERATOR ALLOCATIONS FOR CURRENT TANK VOLUMES

Respondents	Payment Amounts (\$)
COLLINS CORRECTIONAL FACILITY	801
COMMERICAL INTERTECH CORP	5656
CONCORD LITHO CO	801
CONSOLIDATED RAIL CORP	7258
CONSTRUCTION SPECIALTIES	1602
COOPER INDUSTRIES	801
COOPER POWER SYSTEMS	1602
CORSON MANUFACTURING CO, INC	5656
CRETER VAULT CORP	801
DANA CORP	11312
DARLENE JEWELRY	377
DARWORTH CO	4053
DEGRAFF MEMORIAL HOSPITAL	2404
DELTA RUBBER CO	11076
DICO, INC	1602
DIXIE GRAPHICS	9709
DIXON WEAREVER	801
DONSCO, INC	801
DUNKIRK RADIATOR CORP	5656
DYNAMIC CONTROLS CORP	8861
E.J. DELMONTE CORP	1602
EASTERN AIRLINES	9709
EASTERN ELECTRIC APPARATUS REPAIR	3252
EASTERN INDUSTRIES	801
EDWIN MELLON PRESS	801
ELCO CORP/CONNECTOR DIV	10510
ELECTRO CIRCUITS	801
ELECTROCAL, INC	6457
ENSIGN BICKFORD AEROSPACE CO	5656
ERIE PLASTICS	801
ETI TANK CLEANING SERVICES	1602
EUREKA SECURITY PRINTING	13715
FAKE ROBERTS	6457
FAMILY MUTUAL BANK	1602

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Appendix I

DE MINIMIS GENERATOR ALLOCATIONS FOR CURRENT TANK VOLUMES

Respondents	Payment Amounts (\$)
FARRELL CORP	1744
FEDERAL SAVINGS BANK	801
FELTERS CO, INC	1602
FERRO CORP	801
FINGER LAKES LAUNDRY	12726
FISHER PRICE TOYS	801
FLUID PACKAGING CO, INC	141
FORMS, INC	4053
FOSECO, INC	2074
FREQUENCY ENGINEERING LABS	13715
GARDEN WAY, INC	801
GENERAL CHEMICAL CORP	2639
GENERAL TESTING CORP	1602
GENESEE HOSPITAL	14517
GLASS FAB, INC	2404
GLOBE NEWSPAPER CO	4855
GOLD MEDAL LADDER	11312
GRAND ISLAND WASTEWATER TREATMENT PLANT	801
GREATER BUFFALO PRESS (SULLIVAN GRAPHICS INC)	801
GW LISK, INC	3252
HAMILL MANUFACTURING CO	1602
HANDY & HARMON TUBE CO	3252
HAYDEN ENVIRONMENTAL, INC	22623
HEDSTROM CORP	3252
HIGHWAY OIL, INC	801
HUB FOLDING BOX CO	8060
ICI AMERICAS, INC	1037
ITT HIGBIE - BAYLOCK	1602
ITW WATERBURY BUCKLE	377
J.B. SLEVIN CO, INC	13715
J.C. PENNEY	2074
JAMESTOWN ELECTROPLATING	6457
JENERIC/PENTRON CORP	3252
KANE HANDLE	94

Frontier Chemical Site
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Appendix I
DE MINIMIS GENERATOR ALLOCATIONS FOR CURRENT TANK VOLUMES

Respondents	Payment Amounts (\$)
KEYES FIBRE CO	94
KEYSTONE THERMISTOR CORP	2404
KONICA IMAGING USA	8861
L&O MECHANICAL	801
LASER ENGINEERING	94
LEJEUNE STEEL CO	1602
LEVITON MANUFACTURING	801
LEWIS CORP	1602
LITE METALS CO, INC	11595
LOOS & CO, INC	424
LORAL SYSTEMS GROUP	12113
LUCERNE PRODUCTS, INC	8861
LUMINITE PRODUCTS CORP	8861
M. GRUMBACKER, INC	1602
MAGUIRE REAL ESTATE	12019
MAINE YANKEE ATOMIC POWER	801
MARSEL MIRROR & GLASS PRODUCTS, INC	18711
MASLAND INDUSTRIES	283
MCCANN MANUFACTURING CO	6457
MCF INDUSTRIES	801
MEADVILLE FORGING CO	4855
MECHANICAL PRODUCTS, INC	1602
MEDAILLE COLLEGE	801
MENTHOLATUM CO, INC	2404
MERCURY AIRCRAFT, INC	12113
MERIDIAN PRODUCTS	4053
METRO-NORTH COMMUTER RAILROAD	17533
MICHIGAN LIMESTONE	2404
MICRO PRECISION CORP	801
MIDLAND COLOR CORP	801
MISSISSIPPI CHEMICAL EXPRESS	801
MONTGOMERY WIRE CO	518
MORGAN AUTO SUPPLY	801
MORRISON GEOTECHNICAL	801

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Niagara Falls, New York
Appendix I

DE MINIMIS GENERATOR ALLOCATIONS FOR CURRENT TANK VOLUMES

Respondents	Payment Amounts (\$)
MOTOROLA, INC	1602
NASCO AUTO MACHINE	801
NAUGATUCK GLASS CO	2404
NEUMADE PRODUCTS CORP	2404
NEW HOLLAND CUSTOM WOODWORK	801
NIAGARA FALLS ARMY NATIONAL GUARD	801
NORTHSHORE LABORATORIES CORP	4053
NUTEC TOOLING SYSTEMS, INC	801
OLEAN ADVANCED PRODUCTS/DIV OF AVX CORP	12113
OLEARY PAINT CO	801
OLIN HUNT SPECIALTY PRODUCTS, INC	4195
ONTARIO ENGINEERED SUSPENSIONS	12113
OXFORD INNOVATIONS	3252
OZALID CORP	1602
PALL CORP	2404
PASSAIC ENGRAVING, INC	16166
PCC AIRFOILS/SMP	2404
PENN COMPRESSION MOULDING, INC	5703
PERFECTION FINISHERS, INC	5656
PETERSON PAINTING	801
PFAUDLER USA, INC	1602
PHILADELPHIA RESIN	4053
PIONEER PLASTICS CORP	5656
PITTS PONTIAC GMC TRUCKS, INC	2121
PLASTEK GROUP	14517
PLASTIGLIDE MANUFACTURING CORP	1225
PLATING FOR ELECTRONICS, INC	2404
PM REFINING	4855
POCONO RECORD	801
POLOMYX INDUSTRIES	4053
POTTSTOWN MEMORIAL HOSPITAL	424
POTTSVILLE HOSPITAL/WARNE CLINIC	801
POWEREX, INC	801
PRATT & WHITNEY, INC	801

Frontier Chemical Site
Niagara Falls, New York
Appendix I
DE MINIMIS GENERATOR ALLOCATIONS FOR CURRENT TANK VOLUMES

Respondents	Payment Amounts (\$)
PRESTOLITE ELECTRIC OF NEW YORK, INC	801
PRINTCO	12914
PROCINO PLATING	16968
PSG INDUSTRIES, INC	801
PUROLATOR PRODUCTS CO	6033
R&A LEATHER FINISH CO, INC	3252
R.T. ELECTRONICS	801
RADAX INDUSTRIES	6457
RAISIO, INC	801
READING REHABILITATION	1320
REALTY ENGINEERING CO	801
REMLEY & CO	2404
ROBOTRON	801
SACRED HEART HOSPITAL	801
SAFEWAY PRODUCTS, INC	8060
SALVATION ARMY	518
SBS INDUSTRIES	896
SCANFORMS, INC	2404
SCHOTT GLASS TECHNOLOGIES, INC	801
SCHRAM, INC	801
SCIENTIFIC DESIGN CO	4053
SENECA PLATERS, INC	94
SENECA PRINTING & LABEL, INC	4053
SHERIDAN CATHETER CORP	2875
SHERWOOD MEDICAL	801
SID HARVEY CO	8861
SIKA CORP	3252
SIMMONDS PRECISION ENGINE SYSTEMS	11312
SIMON LADDER TOWER, INC	16166
SPECIALIZED PLATING	4855
SPECIALTY METAL PRODUCTS	11312
SPECIALTY PACKING PRODUCTS, INC	14752
SPINCRAFT/DIV OF STANDEX INT'L	7258
STAHL USA	5656

Frontier Chemical Site
Niagara Falls, New York
Appendix I
DE MINIMIS GENERATOR ALLOCATIONS FOR CURRENT TANK VOLUMES

Respondents	Payment Amounts (\$)
STATE UNIVERSITY OF NEW YORK AT BUFFALO	15271
STONER, INC	3252
STURDY LANTERN	1602
SWANSON PLATING	11312
SYRACUSE CITY SCHOOL DISTRICT	2404
TARKETT, INC	6834
TELEDYNE MCKAY	1602
TEXACO, INC	2404
THERMATRU CORP	801
TIBBETS INDUSTRIES, INC	94
TIGHE & BOND CONSULTING ENGINEERS	377
TORRINGTON CO	9709
TRENCH CO, INC	19371
UNIFIRST CORP	7494
UNIFLOW	2404
UNITED PANEL, INC	1602
UNITED SILK SCREEN, INC	4855
US TSUBAKI, INC	2404
VALLEY MANUFACTURING PRODUCTS	1602
VERNE CORP	9049
VOLK MFG CO	2404
VOLTRONICS	801
WESTINGHOUSE ELECTRIC CORP	17533
WEYERHAUSER CO	801
WHYCO CHROMIUM CO, INC	4855
WILKESBARRE CITIZENS VOICE	801
WILLIAMS BAYLEY CO	801

Records printed: 231

Appendix II

FRONTIER CHEMICAL SITE
Niagara Falls, New York

GENERATORS FOR CURRENT TANK VOLUMES

GENERATOR	QUANTITY	CUM. VOL.	% OF TOTAL CONTACT	ADDRESS	CITY	ST	ZIP	PHONE
CARRIER CORP	30720	30720	8.393	MIKE KIMINSKI	CARRIER PARKWAY/PO BOX 4808	SYRACUSE	NY	13221 3154327196
MORRILL PRESS, INC	21006	51726	5.739	JAMIE F. COYNE	6 MORRILL PLACE	FULTON	NY	13069 3155922204
ATOCHEM NORTH AMERICA	14044	65770	3.837	TIMOTHY F. RENS	1740 MILITARY RD	BUFFALO	NY	14240 7168771740
II-VI, INC	13140	78910	3.590	PAUL G. HARRITY	375 SAXONBURG BLVD	SAXONBURG	PA	16056 4123524455
UNITED STATES GOVERNMENT	11010	89920	3.008	DAVID ZUGSCHWERT	US DOJ-ENRD/PO BOX 23986	WASHINGTON	DC	20026 2025144548
PHELPS DODGE SPECIALTY COPPER PRODUCTS	10948	100868	2.991	FRANK MARCINI	720 S. FRONT ST	ELIZABETH	NJ	07207 9083513200
ATHENIA WIRE	10175	111043	2.780	WILLIAM BADER	6176 E. HALLOY RD	E. SYRACUSE	NY	13057 3154636288
AMERICAN CYANAMID CO	8301	119344	2.268	WILLIAM LUTHER	1937 W. MAIN ST	STAMFORD	CT	06904 2033487331
POLLUTION SOLUTIONS OF VERMONT, INC	7361	126705	2.011	DONALD F. MELANDER	2 AVENUE D	WILLISTON	VT	05495 8028601200
REVERE COPPER PRODUCTS, INC	7313	134018	1.998	LARRY PRIEVO	PO BOX 300/SENECA ST	ROME	NY	13440 3153382338
TOWN OF CAMILLUS	6940	140958	1.896	AL AMBRIAK	BELLE ISLE RD	SYRACUSE	NY	13219 3154881234
INDUSTRIAL FUELS & RESOURCES, INC	5703	146661	1.558	CURTIS R. WILLS	604 S. SCOTT ST	SOUTH BEND	IN	46601 2192340441
SOLVENTS & PETROLEUM SERVICE, INC	5527	152188	1.510	DAVID SHANNON	1405 BREWERTON RD	SYRACUSE	NY	13208 3154544467
KEYSTONE CARBON CORP	5468	157656	1.494	JOSEPH MANOVICH	1935 STATE ST	ST. MARY'S	PA	15857 8147811591
FRONTIER CHEMICAL	5391	163047	1.473	4626 ROYAL AVE	NIAGARA FALLS	NY	14303 7162844396
NATIONAL CHEMICAL CO, INC	5161	168208	1.410	RICHARD DISANO	1420 ELMWOOD AVE	CRANSTON	RI	02910 4012312900
AUBURN TECHNOLOGY, INC	5146	173354	1.406	RON SUMMERVILLE	100 ORCHARD ST	AUBURN	NY	13021 3152533241
CYPRUS FOOTE MINERAL	4861	178215	1.328	E.A. GADSBY	15 S. BACTON HILL RD	FRAZER	PA	19355 2156442900
ENVIRONMENTAL WASTE RESOURCES	4458	182673	1.218	SUSAN LUTKUS	PO BOX 10009	WATERBURY	CT	06725 2037552283
FISHER INDUSTRIAL SERVICE, INC	4191	186864	1.145	MIKE FISHER	RTE 9/PO BOX 398J	GADSDEN	AL	35903 2054928340
NIAGARA MOHAWK POWER CORP	4059	190923	1.109	MICHAEL BOESL	HUNTLEY STM STA/3500 RIVER RD	TONAWANDA	NY	14150 7168793876
APPALACHIN ELECTRONIC INSTRUMENT	3448	194371	0.942	MICHAEL MCCLUNG	810 W. MONROE AVE	RONCEVERTE	WV	24970 3046475855
RTI	3181	197552	0.869	ALFRED GABRIELE	65 NEWCOMB ST	ATTLEBORO	MA	02703 5082261950
BUFFALO COLOR CORP	3097	200649	0.846	DAVID SAUER	100 LEE ST	BUFFALO	NY	14240 7168274525
LOEWENGART & CO, INC	3071	203720	0.839	LANA PINE	209 OREGON ST	MERCERSBERG	PA	17239 7173283111
CODO MANUFACTURING	3071	206791	0.839	JOHN C. RANDALL	AVENUE B	LEETSDALE	PA	15056 8002451294
NEW YORK TELEPHONE	3060	209851	0.836	HARLENE A. PHILLIPS	300 E. WASHINGTON ST	SYRACUSE	NY 3153782230
BUCKHAM TRANSPORT LTD	3023	212874	0.826	ROBERT BISSELL	LOT 1, CONC 3	S. MONAGHAN	ONT	KOL180 7059396311
CYCLE CHEM, INC	2862	215736	0.782	MATT FARRELL	217 S. FIRST ST	ELIZABETH	NJ	07206 2013555800
BLUE GRASS CHEMICAL SPECIALTIES	2698	218434	0.737	PAUL MCCAULEY	895 INDUSTRIAL BLVD	NEW ALBANY	IN	49150 8129481115
SCHWEIZER AIRCRAFT CORP	2635	221069	0.720	THOMAS A. WILCOX	PO BOX 147	ELMIRA	NY	14902 6077393821

FRONTIER CHEMICAL SITE
Niagara Falls, New York

GENERATORS FOR CURRENT TANK VOLUMES

GENERATOR	QUANTITY	CUM. VOL.	% OF TOTAL CONTACT	ADDRESS	CITY	ST	ZIP	PHONE
MATHESON GAS PRODUCTS, INC	2416	223485	0.660	MYLES EASON	61 GROVE ST	GLOUCESTER	MA 01930	5082837700
ENVIRO-TANK CLEAN, INC	2383	225868	0.651	FRANK KNOTTS	RTE 1/PO BOX 372	BELPRE	OH 45714	6144230927
TRONEX CHEMICAL CO	2134	228002	0.583	JOHN KOERBER	1401 WOODLAND	DETROIT	MI 48211	3138654600
CASE HOYT CORP	2134	230136	0.583	CHRISTOBAL RODRIGUEZ	800 ST. PAUL ST	ROCHESTER	NY 14601	7162326840
7-ELEVEN STORE	1987	232123	0.543	RICHARD M. FISHER	749 SHERIDAN DR	TONAWANDA	NY 14150	7168779918
MONET, INC	1881	234004	0.514	LEONARD CADELELORA	1400 POST RD	WARWICK	RI 02888	4014344500
BOVANO INDUSTRIES	1878	235882	0.513	JAMES A. FLOOD	830 S. MAIN ST	CHESHIRE	CT 06410	2032723208
CORNING, INC	1852	237734	0.506	673 COUNTY RTE 64	BIG FLATS	NY 14814	6079740276
COMPONENT FINISHING TECHNOLOGIES, INC	1819	239553	0.497	SKEETER WATSON	68 HOLMES ROAD	NEWINGTON	CT 06118	2035269149
MURRAY RECON, INC	1819	241372	0.497	ROBERT STAPLES	PO BOX 104	BUFFALO	NY 14240	7166741415
KELLER MANUFACTURING	1779	243151	0.486	CHRIS BROWN	CENTER & WATER STS	CORYDON	IN 47112	8127382222
MONARCH MACHINE TOOL	1757	244908	0.480	LEN KOZLOWSKI	RTE 13, SOUTH	CORTLAND	NY 13045	6077536001
MAYDEN ENVIRONMENTAL, INC	1757	246665	0.480	JOHN WOODMAN	6015 MANNING RD	MIAMISBURG	OH 45342	5138665908
LAPP INSULATOR CO	1629	248294	0.445	VINCENT DEFELICE	GILBERT ST	LEROY	NY 14482	7167686221
TRENCH CO, INC	1504	249798	0.411	THOMAS KINSLEY	1298 MAIN ST	BUFFALO	NY 14209	7168850017
MARSEL MIRROR & GLASS PRODUCTS, INC	1453	251251	0.397	SAED ABUASI	10101 FOSTER AVE	BROOKLYN	NY 11236	7182729700
BUS INDUSTRIES OF AMERICA, INC	1442	252693	0.394	CHRIS E. JENSEN	BASE RD	ORISKANY	NY 13424	3157688101
DRESSER MANUFACTURING	1442	254135	0.394	CHRISTOPHER S. MINICH	41 FISHER AVE	BRADFORD	PA 16701	8143629225
WESTINGHOUSE ELECTRIC CORP	1362	255497	0.372	J.O. FISHELL	PO BOX 10864	PITTSBURGH	PA 15236	4123827000
METRO-NORTH COMMUTER RAILROAD	1362	256859	0.372	JOHN T. DMYTRYSHYN	FISHER LN	N. WHITE PLAINS	NY 10603	2123402050
TODCO DIV/DALLAS CORP	1362	258221	0.372	ROBIN CLARK	RTE 353	CATTARAUGUS	NY 14719	7162573475
DELAWARE CONTAINER CO	1332	259553	0.364	PETER MASSARO	W. 11TH AVE & VALLEY RD	COATESVILLE	PA 19320	2153836600
PROCINO PLATING	1318	260871	0.360	PATRICK M. PROCINO	901 S. MARKET ST	BLADES	DE 19973	8026290331
CUSTOM DESIGN SERVICES, INC	1318	262189	0.360	DAVID PLATT	30 SOUTH ST	DANBURY	CT 06810	2037481105
SIMON LADDER TOWER, INC	1255	263444	0.343	SHANNON W. BRABANT	64 COALICO CREEK RD	EPHRATA	PA 17577	7178591176
PASSAIC ENGRAVING, INC	1255	264699	0.343	PATRICK R. GARVEY	41 BROOK AVE	PASSAIC	NJ 07055	2017770621
BELOIT MANHATTAN, INC	1193	265892	0.326	TOM LOKUTA	PO BOX 151/IVY INDUSTRIAL PK	CLARKS SUMMIT	PA 18411	7175875111
STATE UNIVERSITY OF NEW YORK AT BUFFALO	1186	267078	0.324	EUGENE J. MONACELL	306 MICHAEL MALL/3435 MAIN ST	BUFFALO	NY 14214	7168313301
ALSY LIGHTING CO	1175	268253	0.321	PAUL SIMPSON	1 EARLY ST	ELLWOOD CITY	PA 16117	4127580707
SPECIALTY PACKING PRODUCTS, INC	1146	269399	0.313	SAL MALLOZZI	316 W. 16TH ST	ERIE	PA 16502	8144559051
GENESEE HOSPITAL	1127	270526	0.308	CHARLES MCGLYNN	224 ALEXANDER ST	ROCHESTER	NY 14609	7162635440

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TRIFARI CRUSSMAN FISCHER, INC	1127	271653	0.308	BRADFORD STAD	3400 PAWTUCKET AVE	E. PROVIDENCE	RI	02915 4014344500
PLASTEK GROUP	1127	272780	0.308	DIANE CARPON	3001 W. 15TH ST	ERIE	PA	16505 8148389667
EUREKA SECURITY PRINTING	1065	273845	0.291	Michael F. CERATO	101 CHURCH ST	JESSUP	PA	18434 7174897538
C.R. BARD CATHERTER & INSTRUMENT	1065	274910	0.291	WILLIAM J. KELLER	266 BAY RD	GLEN FALLS	NY	12804 5187932531
R&D ENTERPRISES	1065	275975	0.291	DIANA FIELD	19430 GERALD	NORTHVILLE	MI	48167 3133497077
FREQUENCY ENGINEERING LABS	1065	277040	0.291	BILL KOECKON	CENTRAL AVE	FARMINGDALE	NJ	07727 9089192532
J.B. SLEVIN CO, INC	1065	278105	0.291	CHUCK NICHOLS	300 E. BALTIMORE AVE	LANSDOWN	PA	19050 2156263434
CHAMPION PRODUCTS, INC	1065	279170	0.291	CHRISTOPHER CONWAY	200 W. MAIN ST	PERRY	NY	14530 7162376111
ROBERTS MEAT PACKING CORP	1021	280191	0.279	JOHN L. STEELE	OLD KIMBERTON RD	KIMBERTON	PA	19442 2156462470
BUNDY CORP	1003	281194	0.274	RONALD L. MASSIE	495 OLD CHILLICOTHE RD	WASHINGTON COURT HOUSE	OH	43160 5133827222
PRINTCO	1003	282197	0.274	KYLA J. LUND	2101 INDUSTRIAL DR	NILES	MI	49120 6166845664
HEAD CORP	1003	283200	0.274	LENNETTE BUBLICH	9540 DORCHESTER AVE	CHICAGO	IL	60628 3127319500
NIAGARA END MILLS	1003	284203	0.274	JIM LUNDY	S. 5TH ST	REYNOLDSVILLE	PA	15851 8146538211
FINGER LAKES LAUNDRY & DRY CLEANERS	988	285191	0.270	EDWARD CLARKE	470 EXCHANGE ST	GENEVA	NY	14456
ARVIN CALSPAN CORP	974	286165	0.266	JOHN NICHALOVIC	4455 GENESEE ST	BUFFALO	NY	14225 7166316948
ONTARIO ENGINEERED SUSPENSIONS	941	287106	0.257	GEORGE LANSENS	201 MARLBOROUGH ST	BLENNHEIM	ONT	NOP1A 5196768166
LORAL SYSTEMS GROUP	941	288047	0.257	JIM CARRELL	1210 MASSILLION RD	AKRON	OH	44315 2167963190
OLEAN ADVANCED PRODUCTS/DIV OF AVX CORP	941	288988	0.257	MERLIN MOSHER	SENECA AVE	OLEAN	NY	14760 7163726611
MERCURY AIRCRAFT, INC	941	289929	0.257	ROBERT FULLMER	17 WHEELER AVE	HAMMONDSPORT	NY	14840 6075692211
MAGUIRE REAL ESTATE	933	290862	0.255	GABRIEL CANPA	95 MT. READ BLVD	ROCHESTER	NY	14611 7164366789
LITE METALS CO, INC	900	291762	0.246	ROBERT E. MCCOY	700 N. WALNUT ST	RAVENNA	OH	44266 2162966110
B & B GREENBERG CO	882	292644	0.241	ALEX CORRENT	333 W. RIVER ST	PROVIDENCE	RI	02904 4012726100
SIMMONDS PRECISION ENGINE SYSTEMS	878	293522	0.240	JOE CORNELL	OXFORD RD PO BOX 310	NORWICH	NY	13815 6073355337
KALMAN DRUM & EQUIPMENT	878	294400	0.240	1036 GREENVALLEY RD/PF WHSE	LONDON	ONT	N6A4C2
SPECIALTY METALS PRODUCTS	878	295278	0.240	JANICE BLOUGH	PO BOX 809	W. MIDDLESEX	PA	16159 4125282900
SWANSON PLATING	878	296156	0.240	RICK W. HILL	RTE 73, SOUTH	MORGANTOWN	WV	26505 3042920021
GOLD METAL LADDER	878	297034	0.240	RAY SHAVER	21 REWEY AVE	NEWARK VALLEY	NY	13811 6076423231
DANA CORP	878	297912	0.240	CHET SOMAL	ROBESON & WEISER STS	READING	PA	19612 2153717275
DELTA RUBBER CO	860	298772	0.235	CAROL VIOLETTE	RTE 12 DYER ST	KILLINGLY	CT	06239 2037790300
ELCO CORP/CONNECTOR DIV	816	299588	0.223	RONALD J. NEULDIJAK	HUNTINGTON INDUSTRIAL PK	HUNTINGTON	PA	16652 8146430700
ATLANTIC REFINING & MARKETING CO	783	300371	0.214	MARSHALL KINNINS	4578 LAKE RD.	BROCKPORT	NY	14420 7166378530

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OWENS PLATING CO	769	301140	0.210	W.E. OWENS	609 SUTTON BRIDGE RD	RAINBOW CITY	AL 35801	2054422577
COMBINE TOOL & DIE CO	754	301894	0.206	17157 E. TEN MILE RD	E. DETROIT	MI 48021	3137779720
DIXIE GRAPHICS	754	302648	0.206	JAY AVRETT	636 GRASSMERE PK	NASHVILLE	TN 37211	6158327000
INTERCERAM, INC	754	303402	0.206	GEORGE SCOTT	FORTUNE RD, WEST	MIDDLETOWN	NY 10940	9146924494
TORRINGTON CO	754	304156	0.206	SEB CANNATA	475 WILLARD AVE	NEWINGTON	CT 06111	2036657000
CHEMIX CORP	754	304910	0.206	CLAIRE ALLISON	55 FIRST AVE	BEREA	OH 44017	2162433680
EASTERN AIRLINES	754	305664	0.206	THOMAS C. KING	MIAMI INTERNATIONAL AIRPORT	MIAMI	FL 33148	3058736246
NYSDEC	703	306367	0.192	MICHAEL FRANKS	270 MICHIGAN AVE	BUFFALO	NY 14202	7168474590
VERNE CORP	703	307070	0.192	GEORGE ZARINS	50405 PATRICIA DR	MT. CLEMENS	MI 48045	3139495850
DYNAMIC CONTROLS CORP	688	307758	0.188	JACK COOLEY	8 NUTMEG RD	S. WINDSOR	CT 06074	2035289971
LUCERNE PRODUCTS, INC	688	308446	0.188	JAMES C. SHIELDS	7600 OLDE EIGHT RD	HUDSON	OH 44236	2166536661
SID HARVEY CO	688	309134	0.188	WILLIAM MENDOZA	100 E. MINEOLA AVE	VALLEY STREAM	NY 11580	5168255654
KONICA IMAGING USA	688	309822	0.188	CHARLES TOZZO	71 CHARLES ST	GLEN COVE	NY 11542	5166742732
LUMINITE PRODUCTS CORP	688	310510	0.188	RANDY FULLER	115 ROCHESTER ST	SALAMANCA	NY 14779	7169453162
MASS CORRECTIONAL INDUSTRIES	644	311154	0.176	LOUIS SIERRA	2405 N. MAIN ST	S. WALPOLE	MA 02071	6177271686
NATIONAL FUEL GAS CORP	637	311791	0.174	ROBERT HARTINGER	10 LAFAYETTE SQUARE	BUFFALO	NY 14203	7168576910
CHICAGO STEEL TAPE CO	626	312417	0.171	JON GERBER	450 CIPES ST	MATSEKA	IL 60907	8154325237
SAFEMAY PRODUCTS, INC	626	313043	0.171	JOHN DANIO	440 MIDDLEFIELD ST	MIDDLEFIELD	CT 06457	2033466601
REPUBLIC ENGRAVING, INC	626	313669	0.171	ROBERT DUNCAN	601 W. 26TH ST	NEW YORK	NY 10001	2122431787
HUB FOLDING BOX CO	626	314295	0.171	TONY TORDIGLIONE	774 NORFOLK ST	HANSFIELD	MA 02048	5083393574
UNIFIRST CORP	582	314877	0.159	RENE R. JOYAL	78-80 E. COTTAGE ST	DORCHESTER	MA 02105	6174272906
OHIO FABRICATORS	564	315441	0.154	JOHN LANG	114 N. 14TH ST	COSHOCTON	OH 43812	6146225922
CONSOLIDATED RAIL CORP	564	316005	0.154	CRAIG CURRY	6 PENN CENTER PLAZA	PHILADELPHIA	PA 19188	1E9S7A685
SPINCRAFT/DIV OF STANDEX INT'L	564	316569	0.154	RALPH BLOCK	67 HIGH ST	BILLERICA	MA 01862	5086672771
HOLBEN GRAPHICS	564	317133	0.154	RICHARD A. MISTIFER	2834 MITCHELL AVE	ALLENTOWN	PA 18105	2154533177
TARKETT, INC	531	317664	0.145	WAYNE J. SUITZER	1139 LENTICH AVE	WHITEHALL	PA 18052	2152665520
SEYMOUR SPECIALTY WIRE/GSI	501	318165	0.137	MICHAEL WILDE	15 FRANKLIN ST	SEYMOUR	CT 06483	2032707420
MCCANN MANUFACTURING CO	501	318666	0.137	JIM VAN	RTE 14A	ONELO	CT 06373	2035644046
FAKE ROBERTS	501	319167	0.137	RONALD E. BUENAR	275 RAILROAD AVE	DALLASTOWN	PA 17313	7172462695
TECH SYSTEMS	501	319668	0.137	WALTER REDER	401 WATERTOWN RD	THOMASTON	CT 06787	2032835801
RADAX INDUSTRIES	501	320169	0.137	DAVID SAWSBURY	700 BASKET RD	WEBSTER	NY 14580	7162652055

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APS, INC	501	320670	0.137	MARK YONO	7600 TYLER BLVD	HENTON	OH	44060	2169511133
POSTING EQUIPMENT CORP	501	321171	0.137	WALTER FUDALA	752 MILITARY RD	BUFFALO	NY	14216	7168772484
ELECTROCAL, INC	501	321672	0.137	CHRIS GERVASCIO	78 EDWIN RD	S. WINDSOR	CT	06074	2032898658
JAP ENAMELAC CORP	501	322173	0.137	JOHN SCHULZ	25 KATRINA RD	CHELMSFORD	MA	01824	5082562212
ADTEC INDUSTRIES	501	322674	0.137	JOHN GAVIN	9 HILL ST	LAWRENCE	MA	01840	5086832082
JAMESTOWN ELECTROPLATING	501	323175	0.137	HAROLD KOLB	105 WATER ST	JAMESTOWN	NY	14701	7166645406
BATTERY ENGINEERING, INC	472	323647	0.129	ANDY ARUDA	1636 HYDE PARK AVE	HYDE PARK	MA	02136	6173617555
PURULATOR PRODUCTS CO	469	324116	0.128	DAVID W. SEELY	3 MIRACLE HILE	ELMIRA	NY	14902	6077378011
GICHNER MOBILE SYSTEMS	458	324574	0.125	EDWARD J. MANARSKI	401 BRIDGE ST	OLD FORGE	PA	18518	7174577426
PENN COMPRESSION MOLDING, INC	443	325017	0.121	FRANK ZENONE	540 PACIFIC ST	IRVIN	PA	15642	4128636400
PRIDE MANUFACTURING CO	439	325456	0.120	GARY TABOR	RTE 15	GUILFORD	ME	04443	2078763315
ANTROL, INC	439	325895	0.120	ROBERT WHEELER	1400 DIVISION RD	W. WARWICK	RI	02893	4018846300
PERFECTION FINISHERS, INC	439	326334	0.120	SCOTT WALKER	1151 N. CHOKEE	HAUSEON	OH	43567	4193378015
CORSON MANUFACTURING CO, INC	439	326773	0.120	JAMES H. SCOTT	20-24 MICHIGAN ST	LOCKPORT	NY	14094	7164348871
MCNILLAN MACHINES	439	327212	0.120	JOHN MCNILLAN	125 LINDLY ST	BRIDGEPORT	CT	06108	EO 20014EO
ENSIGN BICKFORD AEROSPACE CO	439	327651	0.120	WILLIAM S. KETCHIN	660 HOPMEADOW ST	SIMSBURY	CT	06070	2038432043
DUNKIRK RADIATOR CORP	439	328090	0.120	RUSSELL J. ANZALONE	85 MIDDLE RD	DUNKIRK	NY	14048	7163665500
PIONEER PLASTICS CORP	439	328529	0.120	MIKE RODRIGUE	ONE PIONITE RD	AUBURN	ME	04210	2077849111
STAHL USA	439	328968	0.120	JAMES DAILY	CORWIN ST/PO BOX 3039	PEABODY	MA	01961	5085311880
INTERTECH CORP	439	329407	0.120
DISPLAY TECHNOLOGIES	406	329813	0.111	M.J. MUÑOZ	55 LENIGH ST	GENEVA	NY	14456	3157811351
FIREDOOR CORP	406	330219	0.111	1220 OAK PILE AVE	BRONX	NY	10429	2129413500
PUCCI MANIKINS, INC	377	330596	0.103	MICHAEL J. MCLEOD	578 BROADWAY	NEW YORK	NY	10012	2122190142
BECON, INC	377	330973	0.103	BILL MARCHLAND	146 SCHWEIR RD	S. WINDSOR	CT	06074	2035289641
US BAIRD CORP	377	331350	0.103	JAY COMPERTHWAIT	1700 STRATFORD	STRATFORD	CT	06497	2033753371
GLOBE NEWSPAPER CO	377	331727	0.103	GERTRUDE AMES	72 SALEM RD	N. BILLERICA	MA	01821	5086671336
UNITED SILK SCREEN, INC	377	332104	0.103	JAMES E. HOWE	19 BACON RD	ENFIELD	CT	06082	2037496822
NASSAU COUNTY HEALTH DEPT	377	332481	0.103	JAMES M. ADAMSKI	209 MAIN ST	HEMPSTEAD	NY	11550	5164839158
SPECIALIZED PLATING	377	332858	0.103	FREDERICK BINDA	15 WARD HILL AVE	HAVERHILL	MA	01835	5083738030
DINGLEY PRESS	377	333235	0.103	JOHNATHON C. WEISSE	119 LISBON RD	LISBON	ME	04250	2073534151
WHYCO CHROMIUM CO, INC	377	333612	0.103	MARK LAVINE	WATERBURY RD	THOMASTON	CT	06787	2032835826

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SENECA PRINTING & LABEL, INC	377	333989	0.103	THOMAS P. SCHELL	PO BOX 1147	OIL CITY	PA 16301	8146766558
MEADVILLE FORGING CO	377	334366	0.103	MYRUL BURROWS	BALDWIN ST	MEADVILLE	PA 16335	8147241084
ALLEGHENY BRADFORD	377	334743	0.103	SUSAN LENTZ	PO BOX 200	BRADFORD	PA 16701	8143622590
PM REFINING	377	335120	0.103	MAX LEONARD	11135 WALDEN AVE	ALDEN	NY 14004	7166852200
CHARM GRAPHICS	377	335497	0.103	MARC B. KLEBER	25 BOXWOOD LN	CHEEKTOWAGA	NY 14227	7166686233
AIRMASTER SYSTEMS CORP	348	335845	0.095	ROGER PEACOCK	540 OAK ST	FERRYBURG	MI 49409	6168465820
OLIM HUNT SPECIALTY PRODUCTS, INC	326	336171	0.089	GERARD BLETH	3 SPERRY RD	FAIRFIELD	NJ 07004	2015756649
ALLIANCE AUTOMATION SYSTEMS, INC	315	336486	0.086	CHUCK MELIA	400 TRABOLD RD	ROCHESTER	NY 14624	7164262700
TRIEHAUL	315	336801	0.086	NANCY SAVER	RTE 117, NORTH	UNIONTOWN	PA 15901	7174380564
NORTHSHORE LABORATORIES CORP	315	337116	0.086	RICH PELLETIER	4044 ENDICOTT ST	PEABODY	MA 01960	5085313044
BCH LABORATORY	315	337431	0.086	KENNEYN L. JOHNSON	1850 GRAVES RD	NORRISTOWN	PA 19401	2152750281
MERIDIAN PRODUCTS	315	337746	0.086	JOSEPH P. WACHTER	124 EARLAND DR	NEW HOLLAND	PA 17557	7173544637
FILEX STEEL PRODUCT	315	338061	0.086	PETER GOLDSTEIN	WATER ST	OSSINING	NY 10562	9142323921
DARWORTH CO	315	338376	0.086	GLENDON LLEWELLYN	50 TOWER LN	AVON	CT 06001	2036777721
GEMCHEN, INC	315	338691	0.086	LAWRENCE GEMMEL	140 KLEINE LN	LITITZ	PA 17543	7176270248
CORNELIUS ARCHITECTURAL	315	339006	0.086	KEVIN KINNUS	30 PINE ST	PITTSBURGH	PA 15223	4127819003
ADVANCED CONVERSION TECHNOLOGY	315	339321	0.086	THOMAS E. ALBRIGHT	2001 FULLING MILL RD	MIDDLETOWN	PA 17057	7179398314
POLY FAB	315	339636	0.086	RALPH RIGGIN	8919 MCGAM ST	COLUMBIA	MD 21045	3013819533
SCIENTIFIC DESIGN	315	339951	0.086	COLIN JONES	49 INDUSTRIAL AVE	LITTLE FERRY	NJ 07643	2016410500
ALUMAX MILL PRODUCTS, INC	315	340266	0.086	MARK LAWLER	300 ALUMAX DR	TEXARKANA	TX 75501	9038328471
FORMS, INC	315	340581	0.086	KIMBERLY SLATER	ONE FORMS LN	WILLOW GROVE	PA 19090	2156594000
BRIDON AMERICAN CORP	315	340896	0.086	M.R. FIGLO	STEVENS LN	EXETER	PA 18643	7178223349
PHILADELPHIA RESIN	315	341211	0.086	ALBERT J. JURANSKY	13 COMMERCE DR	MONTGOMERYVILLE	PA 18936	2158558450
CHAIRMASTERS, INC	315	341526	0.086	SAM LOUTFI	200 E. 146TH ST	BRONX	NY 10451	2122920600
POLONYX INDUSTRIES	315	341841	0.086	JOHN S. KLIMARCHUK	100 EAMES ST	WILMINGTON	MA 01887	5089880869
CREST FOAM	289	342130	0.079	ROBERT SMITH	100 CAROL ST	MOONACHIE	NJ 07074	2014405092
MARY B. BENSON	267	342397	0.073	CLIFFORD CROTEAU	RD#2 PO BOX 3118	CANONSBURG	PA 15317	4126438765
BROOKWOOD CENTER	256	342653	0.070	ROBERT GROSS	RTE 29 PO BOX 265	CLAVELACK	NY 12513	5188513211
BETTS INDUSTRIES	253	342906	0.069	FRED HIGHHOUSE	7800 PENNSYLVANIA AVE	WARREN	PA 16365	8147231250
AUROMET CORP	253	343159	0.069	NASSAN ELBEDEVE	37 CHASHER ST	NEMPSTEAD	NY 11550	5165384515
GW LISK, INC	253	343412	0.069	ARNOLD BEBERNITZ	2 SOUTH ST	CLIFTON SPRINGS	NY 14432	3154622611

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STONER, INC	253	343665	0.069	W. CHARLES BLAIR	1070 ROBERT FULTON HIGHWAY	QUARRYVILLE	PA	17566 7177867355
NEDSTROM CORP	253	343918	0.069	PO BOX 432	BEDFORD	PA	15522 8146239041
KNOX SEMICONDUCTOR, INC	253	344171	0.069	MARK JOSEPH SNOW	INDUSTRIAL PK	ROCKPORT	ME	05856 2072366076
OXFORD INNOVATIONS	253	344424	0.069	RONALD GOUKER	COMMERCE ST PO BOX 936	NAMOVER	PA	17331 7176324800
CARBON/GRAPHITE GROUP, INC	253	344677	0.069	SUZETTE D. KOSIKOWSKI	4861 PACKARD RD	NIAGARA FALLS	NY	14304 7162859381
WILSON INSTRUMENTS	253	344930	0.069	RAY WILSON	6 EMMA ST	BINGHAMTON	NY	13905 6077704500
CWS INDUSTRIES, INC	253	345183	0.069	CRAIG SMITH	726 KAIGNS AVE	CAMDEN	NJ	08103 6099642371
HANDY & HARMON TUBE CO	253	345436	0.069	JOSEPH V. FERRIZZI	WHITEHALL & TOWNSHIP LINE RDS	NORRISTOWN	PA	19403 2155393900
SIKA CORP	253	345689	0.069	MICHAEL SHORT	875 VALLEY BROOK AVE	LYNNHURST	NY	07071 2019338800
EASTERN ELECTRIC APPARATUS REPAIR	253	345942	0.069	EDWARD GLICA	160 TAPLEY ST	SPRINGFIELD	MA	01104 4137343197
JENERIC/PENTRON CORP	253	346195	0.069	PETER C. GABLE	53 N. PLAIN INDUSTRIAL RD	WALLINGFORD	CT	06492 2032653886
R&A LEATHER FINISH CO, INC	253	346448	0.069	JITENDRA SHAN	812 E. 43RD ST	BROOKLYN	NY	11210 7188592800
LYONS TRANSPORTATION	223	346671	0.061	THOMAS E. STOUT	141 E. 26TH ST	ERIE	PA	16504 8144568551
SHERIDAN CATHETER CORP	223	346894	0.061	KEVIN DONOVAN	RTE 40	ARGYLE	NY	12809 5186386101
GENERAL CHEMICAL CORP	205	347099	0.056	JAMES H. DUMPHY	133 LELAND ST	FRAMINGHAM	MA	01701 5088725000
DEGRAFF MEMORIAL HOSPITAL	187	347286	0.051	RICHARD MARTINEZ	445 TREMONT ST	N. TONAHANDA	NY	14120 7166944500
GRAND HAVEN FURNITURE PRODUCTS	187	347473	0.051	GRAHAM E. HOWE	715 ROBBINS RD	GRAND HAVEN	MI	49417 6168473111
GLASS FAB, INC	187	347660	0.051	RONALD MARINO	257 ORMOND ST	ROCHESTER	NY	14605 7162624000
CUSTOM DESIGNS, INC	187	347847	0.051	HERMAN M. SPRINGLE	PO BOX 216	POCONO SUMMIT	PA	18346 71C8 90398
BROWN STREET FURNITURE	187	348034	0.051	DENNIS J. QUELETTE	BROWN ST	WHITEFIELD	NH	03598 6038372547
KEYSTONE THERMISTOR CORP	187	348221	0.051	ROBERT L. MORRISON	CONGRESS ST	MT. JEWETT	PA	16740 8147789941
PCC AIRFOILS/SHF	187	348408	0.051	MICHAEL CAPEK	29501 CLAYTON	WICKLIFFE	OH	44092 2165853407
PALL CORP	187	348595	0.051	JONATHAN LEWIS	30 SEA CLIFF AVE	GLEN COVE	NY	11542 5166714000
AMHERST HIGHWAY DEPT	187	348782	0.051	RONALD R. YENSAN	1042 N. FOREST RD	WILLIAMSVILLE	NY	14221 7166315990
TEXACO, INC	187	348969	0.051	SCOTT WARREN	2000 WESTSHESTER AVE	WHITE PLAINS	NY	10650 9142537229
BALLET MAKERS, INC	187	349156	0.051	ROBERT MILS	ONE CAMPUS RD	TOTOWA	NJ	07512 2015959000
LG INDUSTRIES	187	349343	0.051	TIM REDDICK	WATERWORKS RD	MAGONTOWN	PA 2155245444
UNIFLOW	187	349530	0.051	NEIL BEVERIDGE	1525 E. LAKE RD	ERIE	PA	16511 8144536761
MARC, STUART, GOLDBERG & ASSOC	187	349717	0.051	R.S. KERTES	60 E. 42ND ST	NEW YORK	NY	10165 2129831500
SYRACUSE CITY SCHOOL DISTRICT	187	349904	0.051	JOHN VERCILLO	725 HARRISON ST	SYRACUSE	NY	13210 3154254226
SCANFORMS, INC	187	350091	0.051	GLENN KRESGE	181 RITTENHOUSE CIRCLE	BRISTOL	PA	19007 2157850101

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VOLK MFG CO	187	350278	0.051 JERRY WALL	US RTE 11	NEW KINGSTON	PA	17072	7177660711
CHEMICAL LEAMAN TANK LINE, INC	187	350465	0.051 RICHARD BARNARD	470 FILLMORE AVE	TONAWANDA	NY	14150	7166951440
US TSUBAKI, INC	187	350652	0.051 TIMOTHY L. BERRY	119 BOWEN RD	BENNINGTON	VT	05201	8024477561
ARROW GROUP INDUSTRIES	187	350839	0.051 STEPHEN WASSEL	100 ALEXANDER AVE	POMPTON PLAINS	NJ	07444	2018355500
GREENSPAN & KUSHLIN ENGRAVING	187	351026	0.051 DEBORAH WYGAND	333 HUDSON ST	NEW YORK	NY	10013	2122552228
CHALLENGE MANUFACTURING	187	351213	0.051 LARRY HARLOCK	3079 THREE MILE RD	WALKER	MI	49504	6164530870
MICHIGAN LIMESTONE	187	351400	0.051 JOHN A. WORDIN	1035 CALCITE RD	ROGER CITY	MI	49779	5177342131
BBW HEAT TREATING	187	351587	0.051 FRED MYERS	2780 KENMORE AVE	TONAWANDA	NY	14150	7168768184
NEUMADE PRODUCTS CORP	187	351774	0.051 WILLIAM BOLDT	2485 WALDEN AVE	BUFFALO	NY	14225	7166840050
REMLEY & CO	187	351961	0.051 LARRY BOYLE	3816 OAK ORCHARD RD	ALBION	NY	14411	7165895551
A.B. DICK CO	187	352148	0.051 RICHMOND C. BEACH	811 JEFFERSON RD	ROCHESTER	NY	14623	7164759050
PTC AEROSPACE DIV	187	352335	0.051 STEPHEN DUBAUSKAS	607 BANTAM RD	LITCHFIELD	CT	06759	2035679441
PLATING FOR ELECTRONICS, INC	187	352522	0.051 CHRISTOPHER FORD	94 CALVARY ST	WALTHAM	MA	02254	6178932368
MENTHOLATUM CO, INC	187	352709	0.051	1360 NIAGARA ST	BUFFALO	NY	14213	7168827660
TRICO PRODUCTS CORP	187	352896	0.051 JAMES A. ROSS	817 WASHINGTON ST	BUFFALO	NY	14203	7168573379
FULLER CO	187	353083	0.051 RALPH E. MCCOOK	236 S. CHERRY ST	MANHEIM	PA	17545	7176649229
NAUGATUCK GLASS CO	187	353270	0.051 DAVID J. MOORE	CHURCH & BRIDGE STS/PO BOX 71	NAUGATUCK	CT	06770	2037295227
INLAND CRAFT CORP	183	353453	0.050 DONALD HIRST	32046 EDWARD ST	MADISON HEIGHTS	MI	48071	3135837150
PITTS PONTIAC GMC TRUCKS, INC	165	353618	0.045 PHILLIP J. PITTS	1067 RIDGE RD	WEBSTER	NY	14580	7168723260
FOSECO, INC	161	353779	0.044 JOSEPH VRH	20200 SHELTON RD	CLEVELAND	OH	44142	2168464548
JOHN H. WILBANKS	161	353940	0.044 JOHN H. WILBANKS	4700 BELAIR RD	BALTIMORE	MD	21206	4104885050
J.C. PENNEY	161	354101	0.044 DONALD PETITO	CHERRY HILL MALL	CHERRY HILL	NJ	4128549405
FARRELL CORP	135	354236	0.037 EDWIN H. DRAB	25 MAIN ST	ANSONIA	CT	06401	2037365511
ADCHEM	124	354360	0.034 FRED E. BROWN	625 MAIN ST	WESTBURY	NY	11590	5163333843
BOJIE SCREEN PROCESS PRINT'NG CORP	124	354484	0.034 RAYMOND BROOKS	NORTHEAST AVE	CONCORD	NH	03301	6032240651
PETERSON PAINTING	124	354608	0.034 THOMAS R. PETERSON	108 KING ST	FALMOUTH	MA	02541	5085401042
UNITED PANEL, INC	124	354732	0.034 ANTHONY J. POLCARI	RTE 512 & WILSON TERRACE	MT. BETHEL	PA	18943	2155886871
VALLEY MANUFACTURING PRODUCTS	124	354856	0.034 CARLO CAPANO	64 WASHINGTON ST	GROVELAND	MA	5083720219
LEWIS CORP	124	354980	0.034 JONATHAN B. KEENE	102 WILLENBROCK RD	OXFORD	CT	06478	2032643100
WAMILL MANUFACTURING CO	124	355104	0.034 DOUGLAS TANSEL	COINING DR	TOLEDO	OH	43612	4194760789
AEROTECH, INC	124	355228	0.034 JOHN TOLOMEI	101 ZETA DR	PITTSBURGH	PA	15238	4129637470

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AMERICAN RED CROSS	124	355352	0.034	LIOLOS JAMES	786 DELAWARE AVE	BUFFALO	NY	14209 7168867500
M. GRUNBACKER, INC	124	355476	0.034	BRIAN A. LEMAY	575 LISBON RD	LISBON FALLS	ME	04252 2073533100
MOTOROLA, INC	124	355600	0.034	WILLIAM T. BRUYERE	611 JAMISON RD	ELMA	NY	14059 7166876000
DICO, INC	124	355724	0.034	SHANE ESTES	8 RIVER DR	CARTERSVILLE	GA	30120 4043828260
TELEDYNE MCKAY	124	355848	0.034	JAY W. DIMLER	850 GRANTLEY RD	YORK	PA	17403 7178492490
CADBURY BEVERAGES, INC	124	355972	0.034	MICHAEL MEADON	4363 RTE 104	WILLIAMSON	NY	14589 3155894911
C.B. CUMMINGS & SONS, INC	124	356096	0.034	STEPHEN E. CUMMINGS	5 BRIDGE ST	NORMAY	ME	04268 2077436326
FIBERCHAR CORP	124	356220	0.034	MICHAEL BAGNIESCH	3336 PIPER RD	ALPENA	MI	49707 5173564533
A.B. CHANCE	124	356344	0.034	DIXON ROGERS	210 N. ALLEN ST	CENTRALIA	MO	65240 3146828432
ITT HIGBIE - BAYLOCK	124	356468	0.034	JOHN ZUCHOWSKI	701 LUGBILL RD	ARCHBOLD	OH	43502 4194458010
FELTERS CO, INC	124	356592	0.034	22 WEST ST	MILLBURY	MA	01527 5088654401
ADCO PRODUCTS	124	356716	0.034	JAMES R. BUCKNANNON	4401 PAGE AVE	MICHIGAN CENTER	MI	48454 5177640334
ALP STEEL CORP	124	356840	0.034	ROBERT W. WAVER	650 EXCHANGE ST	BUFFALO	NY	14210 7168543030
BLUE CHIP PRODUCTS, INC	124	356964	0.034	D.A. BITTNER	1 NEWBOLD RD	FAIRLESS HILLS	PA	19030 2157360901
FAMILY MUTUAL BANK	124	357088	0.034	JOHN BAUMAN	310 MAIN ST	GROVELAND	MA	01834 5085211111
PIVOT PUNCH CORP	124	357212	0.034	BILL CORNELL	6550 CAMPBELL BLVD	LOCKPORT	NY	14094 7166258000
PITTSBURGH PLATING & LAMP SERVICE	124	357336	0.034	STEPHEN COHEN	5817 FORWARD AVE	PITTSBURGH	PA	15217 4124226161
CENTRAL OHIO WELDING, INC/TMC DIV	124	357460	0.034	3520 E. FULTON	COLUMBUS	OH	43227 6142245207
LEJEUNE STEEL CO	124	357584	0.034	ROBERT OMAM	118 W. 60TH ST	MINNEAPOLIS	MN	55419 6128613321
OZALID CORP	124	357708	0.034	ROBERT ROUSAY	PO BOX 2000	BINGHAMTON	NY	13902 6077704665
COOPER POWER SYSTEMS	124	357832	0.034	WALTER R. MATERNA	PO BOX 388	OLEAN	NY	14760 7163757100
STURDY LANTERN	124	357956	0.034	DAVID CLARK	206 E. WASHINGTON ST	N. ATTLEBORO	MA	02761 5086997600
ASTRO-MED, INC.	124	358080	0.034	DENISE MILLS	ASTRO-MED INDUSTRIAL PK	W. WARWICK	RI	02893 4018284000
E.J. DELMONTE CORP	124	358204	0.034	RON JACKSON	909 LINDEN AVE	ROCHESTER	NY	14625 7165863121
GENERAL TESTING CORP	124	358328	0.034	MARSHALL SHANNON	710 EXCHANGE ST	ROCHESTER	NY	14608 7164543760
CONSTRUCTION SPECIALTIES	124	358452	0.034	ROBERT KREITE	RTE 405, WEST	MUNCY	PA	17756 7175465941
ASSOCIATION FOR RETARDED CITIZENS	124	358576	0.034	KENT A. MARTIN	270 COUNTRY CLUB RD	MEADOWLANDS	PA	15347 4122226960
MECHANICAL PRODUCTS, INC	124	358700	0.034	JOHN MULHOLLEN	1824 RIVER ST	JACKSON	MI	49204 5177820391
ETI TANK CLEANING SERVICES	124	358824	0.034	RICK CAMPBELL	1500 ORENDA	MEMPHIS	TN	38107 8007326901
CHAMPAGNE OFFSET	124	358948	0.034	DONALD L. GUILTY	NEWTON	MA	02164 6179691703
THOMAS G. MAGUIRE	124	359072	0.034	THOMAS G. MAGUIRE	95 MT. READ BLVD	ROCHESTER	NY	14611 7164366789

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ABB KENT-TAYLOR	124	359196	0.034	MARK J. MCCLEMENTS	95 AMES ST	ROCHESTER	NY	14692	7162855000
PFAUDLER USA, INC	124	359320	0.034	KEN ROTERA	1000 WEST AVE	ROCHESTER	NY	14603	7162476955
WCA HOSPITAL	124	359444	0.034	JODY CAMPBELL	207 FOOTE AVE	JAMESTOWN	NY	14701	7166648171
VILLAGE STRIPPERS	124	359568	0.034	RANDALL SMITH	50 BIRCH AVE	LITTLE SILVER	NJ	17739	9088423232
FRICTION MATERIALS, INC	113	359681	0.031	JOHN P. LEFAVOUR	17 SHEPARD ST	LAWRENCE	MA	01843	5086860020
READING REHABILITATION HOSPITAL	102	359783	0.028	MATT WLSHNIEMSKI	RD#1 PO BOX 250/MORGANTOWN RD	READING	PA	19607	2157758214
PLASTIGLIDE MANUFACTURING CORP	95	359878	0.026	KEVIN KORN	105 PROGRESS LN	WATERBURY	CT	06705	2037567487
ST. JOHNSBURY TRUCKING CO	81	359959	0.022	MARK CROW	447 HOLLYWOOD AVE	S. PALMFIELD	NJ	07080	9087544930
ICI AMERICAS, INC	81	360040	0.022	BUDDY DAY	RD#3 PO BOX 212/THOMAS RD	EIGHTYFOUR	PA	15330	4129416780
SBS INDUSTRIES	70	360110	0.019	W.R. HESLEY	CROSSKEYS IND PK/THOMAS AVE	WILLIAMSTOWN	NJ	08094	6096292600
REALTY ENGINEERING CO	62	360172	0.017	WILLIAM TAYLOR	56 BLOOMFIELD AVE	PINEBROOK	NJ	07058	2015757200
FRANK ELECTRIC CO	62	360234	0.017	S.G. BURG	700 WILLOW SPRINGS LN	YORK	PA	17405	7177645959
EDWIN MELLON PRESS	62	360296	0.017	STEPHEN WHEATON	450 RIDGE ST	LEVISTON	NY	14092	7167542793
GREAT LAKES LABORATORIES	62	360358	0.017	TIMOTHY EKSTROM	364 E. 21ST ST	ERIE	PA	16503	8144557525
MCF INDUSTRIES	62	360420	0.017	RAYMOND MARK	39 FIRST ST	LOWELL	MA	01853	5084590127
MICRO PRECISION CORP	62	360482	0.017	BARON E. ABEL	200 N. DONNERVILLE RD	MOUNTVILLE	PA	17554	7172855938
ACCO CHAIN & LIFTING PRODUCTS	62	360544	0.017	DANA MYERS	76 ACCO DR	YORK	PA	17402	7177414956
SEBAGO, INC	62	360606	0.017	SAM R. LEDDY	MECHANIC ST	WESTBROOK	ME	04092	2078548474
MEDAILLE COLLEGE	62	360668	0.017	JOEL DUMMEYER	18 AGGASSU ST	BUFFALO	NY	14214	7168843281
CECIL I. WALKER MACHINERY CO	62	360730	0.017	GEORGE MOORE	OLD RTE 60	BELLE	WV	25315	3049496400
BAYLEY WILLIAMS CO	62	360792	0.017	JEFF BANION	1200 WARDEN ST	SPRINGFIELD	OH	45501	5133257301
CARTER RICE PORTLAND	62	360854	0.017	STEVE TAYLOR	ONE RICE ST	PORTLAND	ME	04103	2077973300
OLEARY PAINT CO	62	360916	0.017	BOB FREEMAN	1115 CENTER ST	LANSING	MI	48901	5174820473
MISSISSIPPI CHEMICAL EXPRESS	62	360978	0.017	JAY ARNETT	2200 OAK ST	KEHOVA	WV	25530	3044536734
MODERN ELECTROPLATING CO, INC	62	361040	0.017	BRAD RUSSELL	2430 WASHINGTON ST	BOSTON	MA	02119	6174454400
BARRE ENGRAVING CO	62	361102	0.017	322 N. PENN AVE	WILKESBARRE	PA	18702	7178238894
POWEREX, INC	62	361164	0.017	RON HANDOR	HILLIS ST	YOUNGWOOD	PA	15697	4129257272
PSG INDUSTRIES, INC	62	361226	0.017	FRANK BENDER	1225 TUNNEL RD	PERKASIE	PA	18944	2152573621
SCHRAM, INC	62	361288	0.017	DONALD A. JOHNSON	800 VIRGINIA AVE	W. CHESTER	PA	19380	2156962500
SCHOTT GLASS TECHNOLOGIES, INC	62	361350	0.017	THOMAS J. McDONALD	400 YORK AVE	DURVEA	PA	18642	7174577485
CONCORD LITHO CO	62	361412	0.017	WILLIAM E. POWERS	92 OLD TURNPIKE RD	CONCORD	NH	03301	6032253328

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NATIONAL PLATING, INC	62	361474	0.017	ROBERT WALL	946 EDDY ST	PROVIDENCE	RI 02905	4014613100
POCONO RECORD	62	361536	0.017	R.T. HINTON	511 LENOX ST	STROUDSBURG	PA 18360	7174213000
POTTSVILLE HOSPITAL/MARNE CLINIC	62	361598	0.017	ELIZABETH A. SUBRINE	420 S. JACKSON ST	POTTSVILLE	PA 17901	7176215000
EASTERN INDUSTRIES	62	361660	0.017	DARYL MOYER	RTE 901	SHAWOKIN	PA 17872	7175242251
MORGAN MATROC/VERMITRON DIV	62	361722	0.017	KENNETH S. KUPCAK	232 FORBES RD	BEDFORD	OH 44146	2162328600
COOPER INDUSTRIES	62	361784	0.017	GARY LINNEBORN	3101 BROADWAY	CHEEKTOWAGA	NY 14225	7168966600
BLACKHAWK MACHINE & TOOL	62	361846	0.017	DAVID J. PICHETTE	6 INDUSTRIAL DR	SMITHFIELD	RI 02917	4012327563
NIAGARA FALLS ARMY NATIONAL GUARD	62	361908	0.017	EDWARD ZIELINSKI	9400 PORTER RD	NIAGARA FALLS	NY 14303	7162981446
GREATER BUFFALO PRESS	62	361970	0.017	DAVID PARADOWSKI	1144 MILITARY RD	BUFFALO	NY 14207	7168744973
VOLTRONICS	62	362032	0.017	WILLIAM MARFFIE	100-10 FORD RD	DENVILLE	NJ 07834	2015868585
MORGAN AUTO SUPPLY	62	362094	0.017	JOHN FISHER	216 LISBON ST	LISBON	ME 04250	2073534181
CHURCH & DWIGHT CO	62	362156	0.017	THOMAS STEVENSON	1416 WILLIS AVE	SYRACUSE	NY 13204	3154882961
SAS SHOE CO	62	362218	0.017	CYNTHIA MORTON	SAS DR	PITTSFIELD	ME 04967	2074873252
DONSCO, INC	62	362280	0.017	DAVID SPLAIN	N. FRONT ST	WRIGHTSVILLE	PA 17368	7172521561
LEVITON MANUFACTURING	62	362342	0.017	ELAINE PUCELLA	745 JEFFERSON BLVD	WARWICK	RI 02886	4017374500
BARNET LITHO, INC	62	362404	0.017	ROBERT S. BARKER	307 N. COMRIE AVE	JOHNSTOWN	NY 12095	5187624627
R.T. ELECTRONICS	62	362466	0.017	DEBORAH L. BYRNE	PO BOX 539	MCGRAW	NY 13101	6078368954
RAO, INC	62	362528	0.017	PAUL B. KUJAWSKI	PO BOX 104	BUFFALO	NY 14240	7168943120
FISHER PRICE TOYS	62	362590	0.017	STEPHEN SMITH	711 PARK AVE	MEDINA	NY 14103	7167984700
YORK INDUSTRIES, INC	62	362652	0.017	TOM BILLET	1750 TORONITA ST	YORK	PA 17402	7178461988
HIGHWAY OIL, INC	62	362714	0.017	MARGARET PALMER	1200 BANK IV TOWER	TOPEKA	KS 66603	9133576161
SHERWOOD MEDICAL	62	362776	0.017	BILL CHANCE	108 N. MAIN ST	SHERBORNE	NY 13460	3154710503
DIXON WEAREVER	62	362838	0.017	JOHN BARNETSKY	RTE 61	DEER LAKE	PA 17961	7173661011
MORRISON GEOTECHNICAL	62	362900	0.017	WILLIAM M. PETERLEIN	CHINA RD	WATERVILLE	ME 04901	2078734283
DELAVAN INDUSTRIES, INC	62	362962	0.017	GARY KUJAWSKI	1728 WALDEN AVE	BUFFALO	NY 14225	7168943120
GRAND VIEW HOSPITAL	62	363024	0.017	CHARLENE J. DERVRICH	700 LAWN AVE	SELLERSVILLE	PA 18960	2154534000
ASI PACKAGING CO	62	363086	0.017	MARGARET DACOSTA	9311 HOLLY RD	GRAND BLANC	MI 48439	3136954130
L&O MECHANICAL	62	363148	0.017	JEREMY NITTELLO	3035 SHERWOOD RD	PALMYRA	NY 14552	3155975002
AERODUIP CORPORATION	62	363210	0.017	GARNER POWELL	1225 WEST MAIN ST	VAN WERT	OH 45891	4192381190
FEDERAL SAVINGS BANK	62	363272	0.017	JOHN TUNGEON	424 US RTE 1	KITTERY	ME 03904	6037424680
ARCATA GRAPHICS	62	363334	0.017	DONNA J. MCGREW	TC INDUSTRIAL PK/TAYLOR DR	DEPEN	NY 14043	7166862500

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NORTH PENN HOSPITAL	62	363396	0.017	PAUL GREBB	100 MEDICAL CAMPUS DR	LANSDALE	PA 19446	2153682100
FERRO CORP	62	363458	0.017	RONALD D. SCHARR	661 WILLET RD	BUFFALO	NY 14218	7168257900
STATE FUEL CO	62	363520	0.017	JOANNE SCARPULLS	1726 LONG POND RD	ROCHESTER	NY 14606	7164265290
RAISIO, INC	62	363582	0.017	DALE CLEMONS	THIRD & OAK STS	BERWICK	PA 18603	7177526969
CRETER VAULT CORP	62	363644	0.017	MARY W. WILLIAMSON	RTE 202, SOUTH PO BOX 751	FLEMINGTON	NJ 08822	9087827771
THERMATRU CORP	62	363706	0.017	DOUG ARNEY	108 MUTZFELD RD	BUTLER	IN 46721	2198685811
MAINE YANKEE ATOMIC POWER	62	363768	0.017	SUSAN EDGERLY	BAILEYS POINT	WISCASSET	ME 04578	2078826321
ATLANTIC FABRICATORS	62	363830	0.017	STEVE TULL	101 RTE 35, SOUTH	POINT PLEASANT BEACH	NJ 08742	9088999188
PRESTOLITE ELECTRIC OF NEW YORK, INC	62	363892	0.017	LEONARD MASON	400 MAIN ST	ARCADE	NY 14009	7164921700
NORTHEAST COLLISION	62	363954	0.017	THOMAS R. FISHER	6800 SENECA ST	ELMA	NY 14059	7166528831
BROADCO TRUST	62	364016	0.017	BLAIR PINE	MEDIMAX RD	BREMEN	ME	2075295184
SUN REFINING & MARKETING CO	62	364078	0.017	EDWARD MCDERMOTT	33 TERMINAL RD	PROVIDENCE	RI 02905	4017859200
NEW HOLLAND CUSTOM WOODWORK	62	364140	0.017	DONALD C. LONG	313 PROSPECT ST	NEW HOLLAND	PA 17557	7173544521
ERIE PLASTICS	62	364202	0.017	KATHLEEN OVERFIELD	PO BOX B PLASTICS RD	CORRY	PA 16401	8146644661
GARDEN WAY, INC	62	364264	0.017	PAUL A. HOFFMAN	29 102ND ST	TROY	NY 12180	5182334327
GRAND ISLAND WASTEWATER TREATMENT PLANT	62	364326	0.017	LINDA TUFILLARO	3500 BASELINE RD	GRAND ISLAND	NY 14072	7167739662
ELECTRIC MATERIALS CO	62	364388	0.017	JOHN WILCOX	50 S. WASHINGTON ST	NORTHEAST	PA 16428	8147259621
SPECTRUM FINISH CORP	62	364450	0.017	WAYNE DECHIRICO	50 DALE ST	W. BABYLON	NY 11704	5166940306
MEYERHAUSER CO	62	364512	0.017	MIKE TANPORN	1011 HAWK ST	WESTBROOK	ME 04092	2078548451
MIDLAND COLOR CORP	62	364574	0.017	RICHARD INCONTRO	481 RIVER RD	CLIFTON	NJ 07014	2017733950
WATSON INDUSTRIES	62	364636	0.017	JOSEPH MIRAGLIA	335 HARRISON ST	JAMESTOWN	NY 14701	7164871901
TRUE-TONE ENGRAVINGS, INC	62	364698	0.017	JOSEPH GRUSZECKI	1111 CHANDLER AVE	ROSELLE	NJ 07203	9082415700
WILKESBARRE CITIZENS VOICE	62	364760	0.017	ROY EDDY	75 N. WASHINGTON ST	WILKESBARRE	PA 18711	7178212005
PRATT & WHITNEY, INC	62	364822	0.017	EDWARD BEVINS	415 WASHINGTON AVE	N. HAVEN	CT 06473	2032344760
APOLLO METALS, LTD	62	364884	0.017	MARIE C. REINER	1001 14TH AVE	BETHLEHEM	PA 18018	2158675826
NASCO AUTO MACHINE	62	364946	0.017	BOB HASSON	26 ROTH ST	SACO	ME 04092	2472845344
KVIR-FILL	62	365008	0.017	EILEEN BEERS	1835 HT. HOPE AVE	ROCHESTER	NY	7164731468
21ST CENTURY ENVELOPE	62	365070	0.017	DEBRA DEBELLO	RTE 22	CHRISTEN	PA 16630	8176745830
NEW TECH TOOLING SYSTEMS, INC	62	365132	0.017	KEN DEAN	654 ARCH ST	MEADVILLE	PA 16335	8147246336
COLLINS CORRECTIONAL FACILITY	62	365194	0.017	LAWRENCE E. CARLSON	MIDDLE RD	NELMUTH	NY 14079	7165324588
ROBOTRON	62	365256	0.017	RINDY WILLIAMS	21300 W. B MILE RD	SOUTHFIELD	MI 48086	3133501444

FRONTIER CHEMICAL SITE
Niagara Falls, New York

GENERATORS FOR CURRENT TANK VOLUMES

GENERATOR	QUANTITY	CUM. VOL.	% OF TOTAL	CONTACT	ADDRESS	CITY	ST	ZIP	PHONE
ELECTRO CIRCUITS	62	365318	0.017	DAVID G. COLLINS	76 WALKER ST	LOWELL	MA	01854	5084528981
SACRED HEART HOSPITAL	62	365380	0.017	ROBERT S. SWEENEY	421 CHEW ST	ALLENTOWN	PA	18102	2157764630
CHEMCLENE CORP	62	365442	0.017	W. LLOYD BALDERSTON	258 N. PHOENIXVILLE PIKE	MALVERN	PA	19355	2156442986
MOEBIUS PRINTING CO	44	365486	0.012	ERICH SPEDER	300 N. JEFFERSON ST	MILWAUKEE	WI	53202	4142765311
MONTGOMERY WIRE CO	40	365526	0.011	RICH WHEATLEY	LITTLETON INDUSTRIAL PK	LITTLETON	NH	03561	6034440550
SALVATION ARMY	40	365566	0.011	MICHAEL HAIGH	NORTH AVE & GALVESTON	PITTSBURGH	PA	15212	4122310500
BRIGHT STAR INDUSTRY	33	365599	0.009	PAT CAPATELLI	600 GETTY AVE	CLIFTON	NJ	07011	2013400492
LOOS & CO, INC	33	365632	0.009	DAVID J. FOURNIER	10 CABLE RD	POMFRET	CT	06258	2039287981
POTTSTOWN MEMORIAL HOSPITAL	33	365665	0.009	DAN KLETCHER	1600 E. HIGHSTOWN	POTTSTOWN	PA	19464	2153277069
SCRANTON SEWER AUTHORITY	33	365698	0.009	JOHN LENNEK	307 N. WASHINGTON AVE	SCRANTON	PA	18510	7173485337
DARLENE JEWELRY	29	365727	0.008	JOHN BACCARI	483 MAIN ST	PANTUCKET	RI	02860	4017283300
TIGNE & BOND CONSULTING ENGINEERS	29	365756	0.008	PETER A. LAW	53 SOUTHAMPTON RD	WESTFIELD	MA	01085	4135621600
ITW WATERBURY BUCKLE	29	365785	0.008	DAVID JOSE	952 S. MAIN ST	WATERBURY	CT	06721	2037567487
HASLAND INDUSTRIES	22	365807	0.006	GEORGE BECKY	50 SPRING RD	CARLISLE	PA	17013	7172491866
REZNOR	22	365829	0.006	BEN TUCKER	MCKINLEY AVE	MERCER	PA	16137	4126624400
HEPAR INDUSTRIES	18	365847	0.005	JONATHAN WOODS	160 INDUSTRIAL DR	FRANKLIN	OH	45005	5137436212
DIAMOND EAST LABORATORIES	11	365858	0.003	RALPH HELMRICH	WOODGLEN & ANTHONY RDS	GLEN GARDNER	NJ	08826	2018325333
FLUID PACKAGING CO, INC	11	365869	0.003	RONALD MAHAFFEY	800 AIRPORT RD	LAKEWOOD	NJ	08701	9083671000
KEYES FIBRE CO	7	365876	0.002	PHIL JACKEY	100 COLLEGE AVE	WATERVILLE	ME	04901	2078733307
KANE HANDLE	7	365883	0.002	KARL SWANSON	BIDDLE ST	KANE	PA	16735	8148378383
SENECA PLATERS, INC	7	365890	0.002	DENNIS HAYES	PO BOX 462	AURORA	NY	14052	7166528180
TIBBETS INDUSTRIES, INC	7	365897	0.002	JAMES HUGHES	30 CONCORD AVE	CAMDEN	ME	04843	2072363301
LAZER ENGINEERING	7	365904	0.002	BRIAN HYATT	113 CEDAR ST	MILFORD	PA	01757	5084785991
*** Total ***		365904	99.976						